

From: ECO_San_Diego
To: CAP
Subject: Environmental Center of San Diego comment letter on the Climate Action Plan
Date: Sunday, September 24, 2017 2:50:41 PM
Attachments: ECO County CAP letter.pdf

Letter
04

Dear Ms. Soffel,
Please find attached our comment letter on the County CAP.
Thank you
Environmental Center of San Diego

04-1

Response to Comment Letter O4

Environmental Center of San Diego
Pamela Heatherington, Board Member
September 24, 2017

04-1 The comment provides introductory remarks. No further response is required.



September 25, 2017

Ms. Maggie Soffel
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Via email: CAP@sdcounty.ca.gov

RE: Environmental Center of San Diego (ECO SD) comments on Draft County Climate Action Plan

Dear Ms. Soffel:

Environmental Center of San Diego (ECO SD) supports the comments of Southwest Wetlands Interpretive Association, Endangered Habitats League, and the San Diego Chapter of the Sierra Club and incorporates their comments by reference. In addition, we would like to underscore and add a few comments here.

Annexation of lands out of the County must be addressed

ECO SD has a significant concern about the annexation of lands out of the County (where one land-use or conservation pattern is established and analyzed in the CAP) by a local city (e.g. Escondido, San Marcos) which imposes a significantly more climate destructive land use pattern. This scenario is different than a General Plan Amendment (GPA) which the County can control the mitigation measures, development plan etc.. In the event of these annexations, the County has no control.

As a case in point, Safari Highlands Ranch (500 acres currently zoned for 27 homes and is designated largely as PAMA in the MSCP) is targeted for annexation by the city of Escondido. They propose 550 homes, massive infrastructure, and the worst development pattern for climate, open space, and wildlife imaginable. Escondido is notorious for its lack of commitment to environmental rules or addressing climate change and cannot be trusted to develop in a reasonable way or manner that adequately addressed climate impacts. The County CAP should seek to work with LAFCO to develop a requirement that annexations shall not result in any increases in GHG emissions over the county land use plan and make any other necessary restrictions/requirements to address this issue.

04-2

04-2 This comment references comments made by the Southwest Wetlands Interpretive Association (SWIA), Endangered Habitats League (EHL), and the San Diego Chapter of the Sierra Club and expresses support for the comments submitted by those organizations. Please refer to the responses to letters O2, O12, and O22, respectively, included within the Final SEIR.

The comment also expresses concern regarding potential annexations of land from the County into other local jurisdictions. Specifically, the commenter expresses concern that upon annexation, lands that were formerly within the jurisdiction of the County would no longer be managed by the County and; therefore, would not be subject to the GHG emissions regulations adopted through the CAP. The County acknowledges that annexation proposals that remove land from the County's jurisdiction would remove the County's land use authority to regulate GHG emissions associated with development within that land area. However, there are several ways in which the County can and will coordinate with other local agencies on efforts to implement the State's plan for GHG emissions reductions. The County is a steering member of the San Diego Regional Climate Collaborative and regularly participates in efforts to plan for regional GHG emissions reductions. Additionally, the County will collaborate with the San Diego County Local Agency Formation Commission (LAFCO) to provide the GHG reduction assumptions associated with the land uses proposed for annexation so that LAFCO, as the lead agency responsible for consideration of annexation proposals, can adequately evaluate the GHG impacts of the proposed annexation.

General Plan Amendments that allow density increases cannot be assumed to be 'neutral' impact on emissions.

We strongly object to the very cursory review and conclusion of the many GPAs proposed for the region. 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). This is magical thinking. The off-sets and VMT issues (addressed below) will rely on deal-making at the time. The course of action cannot be relied on to ensure no increases in ghg. The CAP should disallow GPAs that significantly or substantially change land uses or densities. We spent millions of dollars and years developing the current General Plan. The County should make the developer build where it makes sense from a planning perspective, not where their land speculation returns the most profit. The CAP should prohibit GPAs like Lilac Hills, Newland Sierra and others from moving forward. To fail to do this is to fail to recognize the true climate crisis we are in.

04-3

VMT reductions for new residential

There still too many loopholes in the CAP that could enable/induce sprawl and leapfrog development, thereby increasing the potential for more VMTs. The CAP fails to require adequate VMT reductions for residential. This is completely unacceptable.

04-4

It is imperative that the County add a strong component to reduce the vehicle miles traveled – and thus greenhouse gas emissions – generated from newly planned residential development. The plan should not facilitate far-flung sprawl and, as written, does little to stop it. Such development completely undermines the region's efforts to become a carbon-efficient economy.

04-5

Rather, it is incumbent upon the County to use its land use authority to put in place sustainable patterns of development near jobs and transit, as called for by the State of California. This is a significant failing of this CAP unless amended.

Unlimited out-of-county carbon offsets should not be allowed.

Further, the CAP allows ostensibly unlimited carbon off-sets out of county/state/country. If a project cannot offset its carbon emissions it must either be reduced in scale, re-designed, re-conceptualize, or not built. The No Project alternative must be a real and preferred alternative for a project that will exacerbate our local carbon load.

04-6

We find no comfort in the explanation that the County will let developers look outside the County only if allowed by the County (based on a checklist) and only if they can clearly show they have done as much as can be done within the boundaries of the County. All this means is that depending on the staff or political will at the time, this process could also still enable sprawl and approval of GPAs.

04-7

O4-3 This comment states the CAP should prohibit GPAs that significantly change land uses or densities because the commenter disagrees with the assumption that GPAs would achieve net zero. The comment offers no evidence to support its assertion. Nonetheless, the County disagrees with this assertion. First, the approval of GPAs is within the discretion of the Board of Supervisors. Additionally, the CAP is not a land use plan, it is a GHG emissions reduction plan. Therefore, it is not a vehicle to approve or prohibit land uses as the commenter suggests. Second, as described on page 2-14 of the CAP, and further described in mitigation on page 2.7-36 of the Draft SEIR, GPAs would have two options to mitigate GHG emissions. Option 1 would require GPA projects to achieve no net increase in GHG emissions from additional density above the 2011 GPU, which would be demonstrated through the CAP Consistency Checklist. Option 2 would require GPA projects to reduce all project GHG emissions to zero to achieve no net increase over baseline emissions (carbon neutrality). Therefore, with implementation of the CAP, future GPA projects would be required to fully mitigate and demonstrate that GHG emissions above what were planned for in the 2011 GPU are mitigated to less-than-significant levels.

O4-4 This comment states that the CAP does not do enough to reduce leapfrog development and VMT related to residential development. The comment offers no evidence to support its statement. Please refer to response to comment O4-3 regarding urban development. The intent of the CAP is to reduce GHG emissions of development planned for in the 2011 GPU. The CAP is not a regulatory mechanism to reduce leapfrog development. The 2011 GPU includes policy LU 1.2 which intentionally restricts leapfrog development in the County. The CAP sets forth measures to reduce GHG emissions associated with VMT through several mechanisms. GHG Reduction Measure T-1.3 would reduce VMT by increasing diverse uses near residential areas and by increasing pedestrian and bicycle infrastructure. GHG Reduction Measures T-1.1 and T-1.2 would reduce the amount of rural land available to be developed with residential uses in the future, and GHG Reduction Measures T-2.1, T-2.2, T-2.3, and T-2.4 expand

alternative transportation opportunities. Additionally, the County has added GHG Reduction Measure T-3.5 which would result in the installation of 2,040 new Level 2 electric vehicle charging stations through the County, thereby supporting the State's efforts to convert a portion of the vehicle fleet to electric. Please also see Master Response 6 related to transportation GHG reduction measures.

O4-5 The comment asserts that the County should put into action sustainable patterns of development near jobs and transit, and suggests that the CAP should be the mechanism to do this. The County disagrees with this assertion on several points. 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.

O4-6 The comment expresses concern with the County's proposal to allow the use of carbon offsets that are from outside of the county as a component of GHG emissions mitigation. The commenter suggests that the No Project alternative should be considered in cases where projects cannot offset carbon emissions. Please refer to Master Response 12 related to the use of carbon offsets.

O4-7 The comment is related to carbon offsets and contends that "the County will let developers look outside the County only if allowed by the County (based on a checklist) and only if they can clearly show they have done as much as can be done within the boundaries of the County." The comment also states that "this process could also still enable sprawl and approval of GPAs." Please see the response to comment O4-3 and Master Response 12 related to the use of carbon offsets.

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Impacts of GSOB must be calculated

We support the tree planting measures but, unfortunately, our county is being attacked by the Gold Spotted Oak Borer and other pests that are destroying our oak forests and other trees. The loss of a significant amount of forested carbon-sink must be reflected in the total emissions each year. Another good management measure would be to commit significant funds to figure out how to stop the GSOB in this region.

04-8

100% Clean energy goal and CCA should be a goal

Why didn't the County follow the City of San Diego and adopt a 100% goal of clean energy? There is no reason why our entire County cannot be powered by clean energy. Please revise the goal to 100% clean energy. Pursuit of a successful Community Choice Aggregation plan should be included in the CAP.

04-9

Pool Conversions should be facilitated

Since our water supply has a huge amount of energy (and ghg) embedded in it, the reduction of major water uses is paramount. Just as the County is taking assertive action to teach people to compost and capture rainwater to address landfill, water quality, and water supply respectively, so too should it lead the way in encouraging pool conversions. A county education program of how-to and some beautiful and successful plans to convert outdoor pools may result in, at least, stabilizing of the number of individual pools in the region or, better yet, a reduction. Housing developments should be encouraged (or required) to provide for a community pool and individual pools should be disallowed.

04-10

Thank you for the opportunity to comment on this very important document for our region and for our survival.

Sincerely,



Pamela Heatherington
Board member

O4-8 The comment expresses concern with the Gold Spotted Oak Borer (GSOB) and the impacts related to a loss of forest lands in the county. As a component of the GSOB Integrated Pest Management (IPM) Program, County of San Diego Department of Parks and Recreation through County of San Diego Department of Agriculture, Weights, and Measures has initiated pesticide treatments of oak trees located in eight County Park facilities. Each tree identified for treatment is currently infected with GSOB. The focus of this IPM program is to apply a barrier treatment to prevent the egg hatching/adults emerging from the tree trunk. This treatment program is based on the GSOB recommendations from University of California Cooperative Extension Integrated Pest Management Program and U.S. Forest Service research from field trials. A pesticide with the active ingredient Bifenthrin has been sprayed on infected trees from base to first branch. DPR plans to continue budgeting for GSOB spraying. The comment also suggests that the loss of forested carbon-sink must be reflected in the total emissions. Master Response 11 related to carbon sequestration addresses the methodology and data challenges related to doing a complete carbon sequestration inventory for the unincorporated areas.

O4-9 The comment expresses support for a 100% Renewable Energy Alternative and a Community Choice Aggregation plan. The County has included the 100% Renewable Energy Alternative in the Draft SEIR, and a full description is provided on pages 4-19 through 4-23. Additionally, GHG Reduction Measure E-2.1 provides an opportunity for the establishment of a CCA, but does not require one. The measure creates a target of 90% renewable energy that could be satisfied through the establishment of a Renewable Energy Program, which could include a partnership with the local utility, CCA or another similar program. The County could also investigate opportunities to develop a regional or joint effort with other jurisdictions seeking to achieve similar renewable energy goals through a partnership (e.g., Joint Powers Authority). A Renewable Energy Program will allow the County to purchase power on behalf of its residents and businesses to provide cleaner power options, as enabled by

State policy. Ultimately, this would be a decision made by the Board of Supervisors.

O4-10 The comment expresses support for a public outreach effort that would encourage swimming pool conversions and the prohibition of pools for new residences. The County recognizes that water conservation is one way to reduce GHG emissions and would note that the CAP contains GHG Reduction Measures W-1.1, W-1.2, and W-2.1, which emphasize the importance of reducing water consumption and increasing water efficiency. In addition, the County's *Water Conservation in Landscaping Ordinance* limits the surface area of water features such as swimming pools. The ordinance also requires use of recirculating water systems in water features and recommends the use of pool covers to reduce evaporation-related losses. 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 decision makers prior to a final decision on the project.