Letter 09

From: Frank Landis
To: CAP
Subject: CNPSSD response to County of San Diego Climate Action Plan (PDS2015-POD-15-002), General Plan Amendment (PDS2016-GPA-16-007), Draft SEIR (LOG NO. PDS2016-ER-16-00-003).
Date: Monday, September 25, 2017 12:44:16 PM
Attachments: CNPSSD response to CCAP and SEIR 20170925 w attachments.pdf

Dear Ms. Soffel,

Please find attached the response to the County Climate Action Plan and its SEIR. The comment letter is 11 pages long, but the attached file includes two documents from the Climate Action Reserve that we believe need to be analyzed as part of the CAP. O9-1

Thank you for taking our comments. Please let us know if you can open this file, and keep us informed of all documents and meetings associated with the CAP, at this address and at conservation@cnpssd.org.

Thank you!

Sincerely,

Frank Landis, PhD
Conservation Chair
CNPSSD

Response to Comment Letter O9

California Native Plant Society, San Diego Chapter
Frank Landis, PhD, Conservation Chair
September 25, 2017

O9-01 The County acknowledges the comment as an introduction to comments that follow. The comment does not raise issues related to the adequacy of the Draft SEIR. No further response is required.

California Native Plant Society

San Diego Chapter of the California Native Plant Society
P O Box 121390
San Diego CA 92112-1390
conservation@cnpssd.org | www.cnpssd.org

September 25, 2017

Maggie Soffel, Land Use/Environmental Planner,
Planning and Development Services
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123
By email to: CCAP@sdcounty.ca.gov

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

Dear Ms. Soffel,

Thank you for the opportunity to comment on the draft of the County of San Diego ("County") Climate Action Plan ("CCAP") and associated draft subsequent EIR ("SEIR"). CNPS promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices. Our focus is on California's native plants, the vegetation they form, and climate change as it affects both.

In this letter, I am commented both on behalf of CNPS on plant and climate change issues, and as a homeowner and author who roughly a year ago bought a new house with the express intent of decarbonizing it by installing solar panels on its large, south-facing roof, replacing all appliances and utilities with electrical systems, and ultimately purchasing storage batteries and electric vehicles. As an author, in 2015 I published *Hot Earth Dreams: What if severe climate change happens and humans survive?* so I have some small expertise on the subject of climate change. Because I am combining these two comment streams, when I use "we" I am speaking on behalf of CNPS, while "I" speak only for myself.

In general, we are pleased that the County has rewritten the CCAP and want it to be successful. Still, there are many things that need to be clarified, changed, and added to make it work, as detailed below.

O9-1 cont.

Comments From A Decarbonizing Homeowner

Obviously the County has greater resources than I do, but I was unhappily surprised in reading the CCAP to find simple observations missing. **If projects can tier off the CCAP SEIR to streamline their review, how are County Planners expected to detect deceptions?** This is where my simple experience as a homeowner might come in handy.

O9-2

My wife and I bought our current house a year ago, and we chose it explicitly because it had a large, south-facing roof that was good for solar panels. Our plan was to put a large array

O9-3

O9-02 The comment generally asks how projects can tier off the Draft SEIR to streamline their review, and how County planners would be expected to "detect deceptions." It is not clear as to what, specifically, the comment is referring to regarding "deceptions," therefore no further response is required or necessary. Please also refer to response to comment below O9-30. On the CAP as a qualified CAP please see Response to Comment O11-3.

O9-03 The comment expresses concern about the cost of photovoltaic systems and electric vehicles and suggests that the County should subsidize these purchases. The County recognizes that implementation of the CAP comes with a cost. The County has prepared a cost-benefit analysis to inform the Board of Supervisors on the costs to implement the CAP which is included with the Planning Commission Hearing Report as an attachment called the Climate Action Plan Cost-Effectiveness Analysis. The County acknowledges this comment; however, it does not raise any issues with the adequacy of the Draft SEIR. Therefore, no further response is required.

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on the roof, buy a large storage battery, switch all the utilities and appliances to run on solar electricity, buy an electric car (we still have one gas car), and to shrink our carbon footprints as much as possible.

Currently we have a 600 ft^2, high end solar array, a Chevy Bolt electric car, and class two car charger. these two cost us well over $50,000, and by the time we finish remodeling the house and get a house battery (none are currently satisfactory, see below), our outlay will be closer to $100,000. The only point of mentioning costs is that, if we assume that there are around 1,000,000 households in San Diego County, expecting them to all pay for their own solar and electric cars is going to cost *at least* $50,000,000,000 and possibly twice that. This is an intolerable burden, and indeed, it's about the average annual income for most households. **If the County wants to reduce emissions, it will have to help the residents do so. Most cannot afford to do it on their own. Bringing costs down is a critical part of the CCAP, and it needs to be brought to the fore.** O9-3 cont.

Our solar array generates up to 30 kWh per day on an optimistic average (ranging from under 20 kWh on a rainy day to 40 kWh on a sunny summer day). That is 20 ft^2 of solar panel per kWh per day, which might be a useful "rule of thumb" for planners trying to understand development proposals. **When considering a proposal, especially a large development requiring a General Plan Amendment, it is necessary to ask questions, such as: how much electricity is the development proposing to generate, either for its own use or for export? Does it have the south and west-facing solar arrays to generate that electricity? Do they shade each other? If the answers are unsatisfactory, then County planners should ask the developer to redo the design.** This rough estimate of 20ft^2 per kWh per day will hold true for awhile. While the sun puts out 1 kW per 10 ft^2, this is a maximum, and everything from weather to panel angle to conversion inefficiency decreases the amount of electricity generated. Future solar panels will get a bit better, but they won't get an order of magnitude better. O9-4

Our Chevy Bolt has a 60 kWh battery, and can drive something like 240 miles on a single charge, or around 4 miles per kWh. It would take two days of sun for our 30 kWh/day solar panels to fully recharge the car. Since Tesla only sells 16 kWh house batteries currently, we cannot yet charge up the house battery, then use that battery to charge the car. The second problem is that the car charges at the rate of about 8 kWh per *hour* through our second generation charger, and our house only produces around 30 kWh per *day*. As a result, if we charge during the day, we start pulling power from the grid, when electricity rates are at their highest. Currently it is cheaper for us to send power to the grid during the day and to charge at night when rates are low. Batteries and charging speeds matter, and the CCAP probably could do a better job emphasizing this. **What measures can the County take to promote battery technology within buildings and the grid as a whole?**

Scaling up our car to the CCAP estimates of miles driven, it appears that if the County somehow switched entirely to electric cars, it could run that fleet most days off of 3-5 square miles of solar panels, spread out across the County. This is far from impossible, but the problem is concentrating that energy, both through charging batteries that can discharge quickly into cars, and also through putting solar arrays where electric cars are parked during the day, rather than asking homeowners to buy expensive arrays and batteries to charge their cars at night. Fostering commercial urban solar arrays, battery arrays, and charging stations is a major component of making electric vehicles work. O9-5

The reason for mentioning all this comes from documents like the Newland Sierra EIR, where solar panels (or rather, solar roof tiles) are mentioned primarily as a GHG mitigation O9-6

O9-04 The comment suggests that when considering a large development requiring a General Plan Amendment, it is necessary to ask questions, such as: how much electricity is the development proposing to generate, either for its own use or for export, as well as orientation of roofs. As detailed in Section 1.2.4 of the Draft SEIR, if a project is not consistent with the density in 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 CAP Checklist for New Development. The analysis conducted in the CAP Checklist for New Development demonstrates how the project would achieve consistency with the CAP through implementation of the measures outlined in the Checklist. Section 2.7.5 of the Draft SEIR provides a complete description of the GPA process for evaluating GHG emissions. Projects that are required to prepare a project-specific GHG emissions analysis will be required to incorporate all feasible design measures on-site, including PV systems. The PV systems that are incorporated into the project design typically are determined by several factors, such as available roof space, infrastructure, roof orientation, etc. and is determined at the project level of analysis. Please refer response to comment O9-7 and Master Response 10 on the CAP as a programmatic document.

This comment also asks what measures the County can take to promote battery technology within buildings and the grid as a whole. The County and the Draft CAP generally support new measures and technology and will account for such changes through implementation and monitoring of the Draft CAP. Please see Chapter 5 of the CAP, Implementation and Monitoring.

O9-05 The comment suggests that the best way to maximize fleet conversion to electric vehicles would be to expand commercial

	urban solar arrays, access to PV, PV batteries, and charging stations. The CAP includes GHG Reduction Measures E-2.1, E-2.2, and E-2.3 which would result in increased availability of renewable energy sources in the county. In response to similar comments, the County has included GHG Reduction Measure T-3.5 to increase the uptake of EVs throughout the unincorporated County. The comment does not address the adequacy of the Draft SEIR. Therefore, no further response is required. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.
	O9-06 The comment expresses an opinion about PV as a mitigation measure for a private development project in process. The Newland Sierra project released a Draft EIR that was circulated for public review from June 15, 2017 to August 14, 2017. The County acknowledges this comment; however, it does not raise any issues with the adequacy of the Draft SEIR prepared for the Draft CAP and associated actions. Therefore, no further response is required. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.

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factor. Anyone looking at proposed street map for that development (which sits in a steep-walled, north-south running valley) would see that most lots were at best suboptimally angled to produce a lot of solar power, and to make the mitigations work, each house would have to be custom built to catch the sun and not shade its neighbors. Still, the County accepted this document without asking the project proponent to produce numbers demonstrating that their proposed mitigation would work. O9-6

This is where simple numbers, like 4 miles driven per kWh, or 20 ft^2 of solar array producing 1 kWh/day, are useful. They are not precise, and all development proposals should have much more accurate figures. Still, if a project proposes to generate thousands of car miles travelled every day, and does not have tens of thousands of square feet of solar arrays dedicated solely to charging cars, it is necessary to ask where the developer expects the energy for the cars to come from, and to figure out how to mitigate those impacts as well. O9-7

Finally, a small point: why does the proposal to use natural gas in a new project not have to be justified automatically? As I am finding as a homeowner, every appliance and utility powered by natural gas has an electrical equivalent that is the same price or even cheaper. Yet natural gas pipes are still installed as a matter of course, even when as at Newland Sierra, they have substantial GHG impacts through both installation and subsequent leakages. As a homeowner, I will have to pay to replace all the gas appliances in my new home, remodel the kitchen around the new appliances, and pay to have the gas ultimately shut off. As San Diegans, we know that natural gas is at best a temporary convenience and at worst an extremely problematic greenhouse gas. We know someone will have to pay to have natural gas uninstalled sometime during my life, unless an earthquake does it for us. **Why even install natural gas now? Why not ask developers to justify the installation of natural gas or any other fossil fuel supply, rather than assuming it must happen as a matter of course?** O9-8

Climate Action Plan Comments

Chapter 2

First, one important omission is that San Diego County has quite a lot of sequestered carbon in its trees, shrubs, marsh and riparian sediments, and root systems, not to mention the wood in existing wooden structures. When these systems are destroyed, all of that carbon either goes back to the air, or enters the waste stream and thereby contributes to GHG emissions. Loss of existing stocks of sequestered carbon must be considered as part of any development in wildlands or redevelopment where substantial demolition is required. **What mechanisms can be developed to provide the County with a usable and continuously updated accounting of the carbon already sequestered in the County? What measures can be deployed to streamline accounting for impacts to this stock of carbon, and to merge it with accounting of carbon sequestered under the CCAP?** O9-9

Second, we are puzzled by the County's decision to use 2014 as the baseline year from which to calculate greenhouse gas ("GHG") emissions reductions. As we understand California AB 32, SB 32, EO B-30-15, and EO S-3-05, 1990 is supposed to be the benchmark year against which GHG emissions are measured. While San Diego County does not have emissions data from 1990, a 1990 GHG emissions inventory estimate for the San Diego County was created by the Energy Policy Initiative Center at the University of San Diego[1] in 2013. **Why was this** O9-10

[1] "San Diego County Updated Greenhouse Gas Inventory. http://catcher.sandiego.edu/items/usdlaw/EPIC-GHG-2013.pdf. Accessed September 21, 2017

O9-07 The comment generally states that the solar power mitigation for car miles generated from a private development project will not work. Please see the response to comment O9-04. The County acknowledges this comment; however, as a point of clarification, the CAP and Draft SEIR are programmatic documents that establish the actions that would be implemented to reduce GHG emissions in compliance with 2020 and 2030 targets and disclose the possible environmental impacts of doing so. With regard to specific project-level mitigation, applications for new development would be required to demonstrate consistency with the CAP. In cases where new development is not consistent with the density in the 2011 GPU, projects would be required to prepare a project-level GHG emissions analysis during which time projects may choose to utilize photovoltaic systems to offset emissions. Each project would be reviewed under the County's discretionary process which includes CEQA and will be evaluated for specific mitigation programs as needed.

O9-08 This comment expresses the opinion that the use of natural gas appliances should be regulated. The comment addresses a private project in process with the County of San Diego. New development will be required to provide electric or alternative-fueled water heating systems through Item 5a of the CAP Checklist for New Development. However, this may include tankless natural gas water heaters, which use a lower amount of natural gas than a comparable tank-based natural gas heater. The State identifies a shift from natural gas end uses as part of its overall strategy to achieve long-term climate goals. The County is addressing the water heating end use as specified above and will continue to monitor the State's strategy to incorporate further reductions from natural gas end uses and a potential shift to renewable natural gas, when feasible, in future CAP updates. No specific comments were raised on the adequacy of the Draft SEIR. Therefore, no further response is required. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.

	O9-09 This comment asks questions about how carbon sequestering vegetation can be quantified and continuously monitored. Please refer to Master Response 11 on carbon sequestration. **O9-10** This comment requests clarification about why the 2014 baseline GHG emissions inventory was chosen. Please refer to Master Response 4 regarding GHG reduction targets and the baseline inventory. The commenter does not provide any evidence that the 2014 baseline is inadequate. Therefore, no further response is required or necessary.

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estimate ignored? Why not use estimates from 1990, 2006 (the previous CCAP baseline), and 2014 to demonstrate the validity of the method proposed in the current CCAP? O9-10 cont.

Third, the County emissions reductions (pp. 2-11 to 2-12) are confusing. **If the 2020 emissions goal is assumed to be the same as the 1990 goal, shouldn't this emission level (3,147,247 mmtCO_2e) be the baseline against which all future emissions reductions are measured, rather than the 2014 measured baseline of 3,211,505 mmtCO_2e?** If the calculations were done this way, things look rather different:

All non-percents in mmt CO_2e	CCAP Proposal	2014 (CCAP) (3,211,505)	1990/2020 (3,145,247)	Shortfall
2020 (=1990)	3,145,247	97.9%	100.0%	
2030 (=40% below 1990)	1,926,903	60.0%	61.3%	39,755
2050 (=80% below 1990)	738,646	23.0%	23.5%	15,293 (or 109,597 if 80% reduction instead of 77% reduction is used)

O9-11

This is a significant difference. **Why did the County choose to do the calculations as it has? What is going on with the shortfall of reductions in 2050?**

Fourth, the method for dealing with General Plan Amendments (GPAs) is unclear. Obviously it relates to mitigation measure GHG-1 in the DSEIR. However, it is unclear whether this will work, for two reasons. One was noted above. On Newland Sierra, one of the GPAs in question, the mitigations were so nebulous (putting solar tiles on roofs, electric chargers in garages, buying offsite credits in the approved GHG-1 fashion), that it was impossible to determine if the impacts of Newland Sierra would actually mitigated by the measures proposed. **How can this mitigation measure be quantified to make it easier for GPAs to meet County goals.** O9-12

The other problem might be more serious. Climate Action Reserve (CAR) one of the CARB-approved registries, has language like the following in both its Forest Project Protocol[2] and its Urban Tree Planting Protocol.[3] Projects must meet a legal requirement, The language in the Forest Project Protocol is as follows (p. 8):

"Legal Requirement Test. Forest Projects must achieve GHG reductions or removals above and beyond any GHG reductions or removals that would result from compliance with any federal, state, or local law, statute, rule, regulation, or ordinance. Forest Projects must also achieve GHG reductions and removals above and beyond any GHG reductions or removals that would result from compliance with any court order or other legally binding mandates including management plans (such as Timber Harvest Plans) that are required for government agency approval of harvest activities." O9-13

The Urban Tree Planting Protocol (p. 7) reads as follows:

"3.4.1 Legal Requirement Test

[2] Forest Project Protocol v 4.0. http://www.climateactionreserve.org/how/protocols/forest/, accessed September 21, 2017.

[3] Urban Tree Planting Protocol v 2.0. http://www.climateactionreserve.org/how/protocols/urban-forest/, accessed September 21, 2017.

O9-11 This comment expresses confusion with the 1990 level and 2020 emissions reduction year. Please refer to Master Response 4 for GHG reduction targets.

O9-12 This comment expresses an opinion that the method for dealing with GPAs is unclear and "that it was impossible to determine if the impacts of Newland Sierra would actually be mitigated by the measures proposed." This comment does not address the adequacy of the SEIR. Each GPA would have to conduct their own analysis as part of CEQA to quantify their emissions from GHGs and quantify—where data to do so is available—emissions reductions from design measures and mitigation. The County disagrees with this assertion as the Draft SEIR provides a framework for future discretionary projects to follow as detailed in the response to comment O9-04. Please also see the responses to comments O9-06 and O9-08. See Section 2.7.5 of the SEIR for specific detail on cumulative impacts.

O9-13 The comment provides information related to the Forest Project Protocol and Urban Tree Planting Protocol which are included in Appendix B of the Draft SEIR, and are two of the sample protocols that the County could consider as a direct investment in the unincorporated area. The commenter expresses disappointment that CNPS did not receive a response from California State Parks regarding a carbon offset project in Cuyamaca Rancho State Park. This does not address the adequacy of the direct investment program, the CAP, or the CAP SEIR or any CAP SEIR mitigation; therefore, no further response is required or necessary. It should be noted that the County has consulted with multiple CARB-approved carbon registries, including Climate Action Reserve. Please refer to Master Response 3 regarding direct investments and Response to Comment O14-13.

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"UTP Projects must achieve GHG reductions or removals above and beyond any GHG reductions or removals that would result from compliance with any federal, state, or local law, statute, rule, regulation, or ordinance. Projects must also achieve GHG reductions and removals above and beyond any GHG reductions or removals that would result from compliance with any court order or other legally binding mandates. Deeded encumbrances, tree-planting and management ordinances, and contractual agreements, collectively referred to as Legal Agreements, may effectively control urban forest carbon and possess ownership rights to the carbon inventories controlled. Similarly, deeded encumbrances, tree planting and management ordinances, and contractual agreements may have an effect on urban forest carbon inventories beyond the control of any of the Urban Forest Owners. ***Trees planted to fulfill a legal requirement are ineligible under this protocol. Legal requirements include any requirement issued by authority of a federal, state, or local jurisdiction to plant trees for any reason.***" [emphasis added]

We are not lawyers, but we believe Timber Harvest Plans are considered equivalent to EIRs, and the last sentence of the Urban Tree Planting Protocol seems definitive. Moreover, we know that the Cuyamaca Rancho State Park (CRSP) Reforestation Plan, the only CAR project in southern California, was run under three emergency CEQA exemptions, and State Parks repeatedly refused to put the project in their General Plan Update, despite the fact that it would last for 100 years and cover 25% of the CRSP. We never received a clear response from State Parks as to why they acted as they did, but to us, it appeared that they wanted to avoid involving CEQA in the CRSP Reforestation Project.

Also, we have not checked other CAR protocols or the protocols of other registries. We strongly recommend that the County does so.

At this point, we strongly advise consulting with CAR and all other climate registries considered for GHG-1 mitigation to determine if they are willing to work on projects mandated by the County to meet the CCAP. Which registries and similar entities are willing to help the County implement CCAP and projects that tier off of it? O9-13 cont.

Chapter 3

First, as noted in comments on Chapter 2, are the GHG targets for 2030 and 2050 consistent with state guidelines? If not, what can be done within the CCAP framework to meet state mandated targets? O9-14

We also have specific comments on Chapter 3.

First, we agree that a formal five-year review is a good idea. However, this should not preclude consideration and rapid adoption of more effective GHG reduction measures that become available between review periods. **Can this be written into the CCAP?** O9-15

Second, Table 3.1 and Figure 3.1 seem to indicate that there is a disproportionately low percentage of future GHG reductions in the transportation and built environment fused category. In terms of emissions, transportation and built environment accounts for 46% of annual GHG emissions, yet that category accounts for only 13% of GHG reductions by 2030. Obviously the County can't buy everyone an electric car, but as I noted above, this does shift the cost of decarbonizing onto households who have to buy new cars or move to be near new transportation corridors. **What can be done by the County to further decrease the amount of GHG emitted by the transportation sector?** O9-16

Third, acquiring open space does decrease GHG emissions, so long as the plants on that space are not burned, bulldozed, or cleared in the construction of unpermitted mountain bike O9-17

O9-14 This comment questions whether the 2030 target and 2050 goal proposed in the CAP are consistent with State targets. As described in detail on page 2-10 through 2-13 of the CAP, the GHG emissions reduction 2030 target and 2050 goal established by the CAP are consistent with State legislation. Please also refer to Master Response 4 related to GHG reduction targets.

O9-15 This comment expresses interest in seeing the CAP updated more frequently than every 5 years if more effective GHG reduction measures become available between review periods. As detailed in Section 1.2.2.1 of the Draft SEIR, as part of the evaluation of CAP implementation, each strategy and measure must be continually assessed and monitored. Annual tracking and reporting on the status of implementation of the measures, periodic updates to the GHG emissions inventories (every two years), continual CAP updates (every five years beginning in 2025), and other monitoring activities would help to ensure that the adopted CAP is making progress towards meeting established reduction targets. The implementation and monitoring actions detailed in Chapter 5 of the CAP are the mechanism to monitor that progress (i.e., updated GHG inventories and annual monitoring reports). Consistent with the requirements of CEQA Guidelines Section 15183.5 (b)(1)(E), an agency is required to monitor the CAP's progress and amend it if it is determined that the plan is not achieving its specified targets. If amendments to the CAP are required they would be reviewed considering CEQA's requirements for subsequent environmental review as outlined in Section 15162 to 15164.

O9-16 The comment expresses concern about why the CAP contains a disproportionate amount of measures that are related to the transportation sector. Please refer to the Master Response 6 on transportation GHG reduction measures. In response to public comment the County has included GHG Reduction Measure T-3.5- to increase the uptake of EVs throughout the unincorporated County.

O9-17 The comment expresses concern that the benefits of sequestered carbon in the County's open space can only be

	harnessed if the ground remains undisturbed and questions how the County can help protect those lands. The County acknowledges this comment. In the case of unpermitted grading or other destructive behaviors that destroy open space lands, the County has the regulatory authority to enforce trespassing against unauthorized users. No specific comments were raised on the adequacy of the Draft SEIR. Therefore, no further response is required or necessary. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.

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trails. As noted above, there is already carbon sequestered on open space lands. **How will sequestered carbon be protected and kept out of the atmosphere?** This requires working with groups as diverse as the mountain biking community and fire fighters, for sequestered carbon is also known as dead wood, dry brush, and fuel. **What can the County do to develop a more sophisticated understanding of land use that allows them to recognize the often conflicting land use needs and to include the CCAP as a real priority that interacts with other real land management needs?**

Fourth, we agree with the need to update community plans, because higher density around new and improved transportation corridors is a key way to reduce vehicle miles traveled. The enemy of such development are leapfrog sprawl developments (such as Newland Sierra and Safari Highlands). **In the face of problematic General Plan Amendments, what can the County do to create and follow a General Plan that implements the CCAP?**

Fifth, with regard to measure T-4.1 (p. 3-37), conceptually we agree that the County should establish a program to invest in local projects to offset GHG emissions. Given our concerns about CAR described above, **we strongly suggest that the County insure that *all* potential partners are willing and able to work under the legal limits of the CCAP, the County General Plan, CEQA, and all other pertinent regulations. In addition, we are also concerned that this will become the equivalent of GHG "indulgences," where programs are used for other purposes under the rubric of GHG sequestration. What guarantees can be put in place to make sure this does not happen?** CRSP provides another example. According to Park staffers who did not speak on the record, the CRSP Reforestation Plan was deliberately created as a way for corporations to donate money into reforesting CRSP after the 2007 fires. The corporations involved knew that the CRSP Reforestation Program would almost certainly never meet its carbon sequestration targets. Reforestation is generally a good thing, but the CCAP could become a boondoggle if measure T-4.1 is used as a slush fund for projects (neighborhood beautification, planting eucalyptus plantations) that are unlikely to meet carbon sequestration goals over the often 100 year-long contract periods. **What kinds of public transparency and other measures will be done to insure this never happens? If international investments are considered, what disclosure, transparency, and accounting mechanisms can be put in place to insure that investing in, say, swampland in Indonesia is safer than investing in the proverbial Florida swampland?**

Sixth, we agree with the County's desire to plant more urban trees, along roads and elsewhere and we strongly advocate that native trees be a major part of the mix. Still, there are three issues associated with this proposal.

- Following the California Shade Control Act of 1974, we strongly suggest that planners and developers be explicitly advised to create urban tree planting plans that do not conflict with solar and wind power plans. Too often in EIRs, these are separate, boiler plate sections, and the shading and wind-blocking effects of trees are not considered, either by the landscape architects in charge of tree planting plan or by the engineers in charge of planning the power systems. **What can be done to insure that these two elements are considered together, as required by the 1974 act?**
- Street trees have a notoriously short life. **What can be done to sequester the carbon in dead street trees? If the County pursues urban tree planting programs with registries like CAR, what will the County do to insure that the trees live long enough and grow big enough to meet contractual requirements?**

O9-17 cont.
O9-18
O9-19
O9-20
O9-21
O9-22
O9-23

O9-18 The comment asks what can the County do to develop a more sophisticated understanding of land use that allows them to recognize the often conflicting land use needs and to include the CAP as a real priority that interacts with other real land management needs. This comment is unclear. However, in an effort to be responsive, the following is noted. The CAP is not a land use plan. Land use is regulated through the 2011 GPU. As detailed in Section 1.2.2.1 within the Draft SEIR, some of the proposed CAP measures would be implemented through regulations adopted by the County based on the County's ability to protect the public health, safety, and welfare of its citizens. County ordinances, resolutions, and discretionary review processes also provide a mechanism through which to implement CAP measures. Coordination among County departments will be critical to the successful implementation of many CAP measures. Additionally, while many of the CAP measures and supporting efforts would be limited to actions that can be taken by the County, implementation of some CAP measures would also require coordination and joint actions with local, regional, state, and federal agencies.

O9-19 The comment expresses concern that the County is not implementing the 2011 GPU. The County disagrees with this comment. The 2011 GPU provides the foundation for land use designations within the unincorporated County, and the CAP is the greenhouse gas reduction plan which satisfies the 2011 GPU PEIR Mitigation Measure CC-1.2 which was a part of the adoption of the 2011 GPU. GPAs are separate discretionary actions that can be taken by the Board of Supervisors. Please also see the response to comment O9-04 and the Draft SEIR pages 2.7-36 through 2.7-40 related to GPAs.

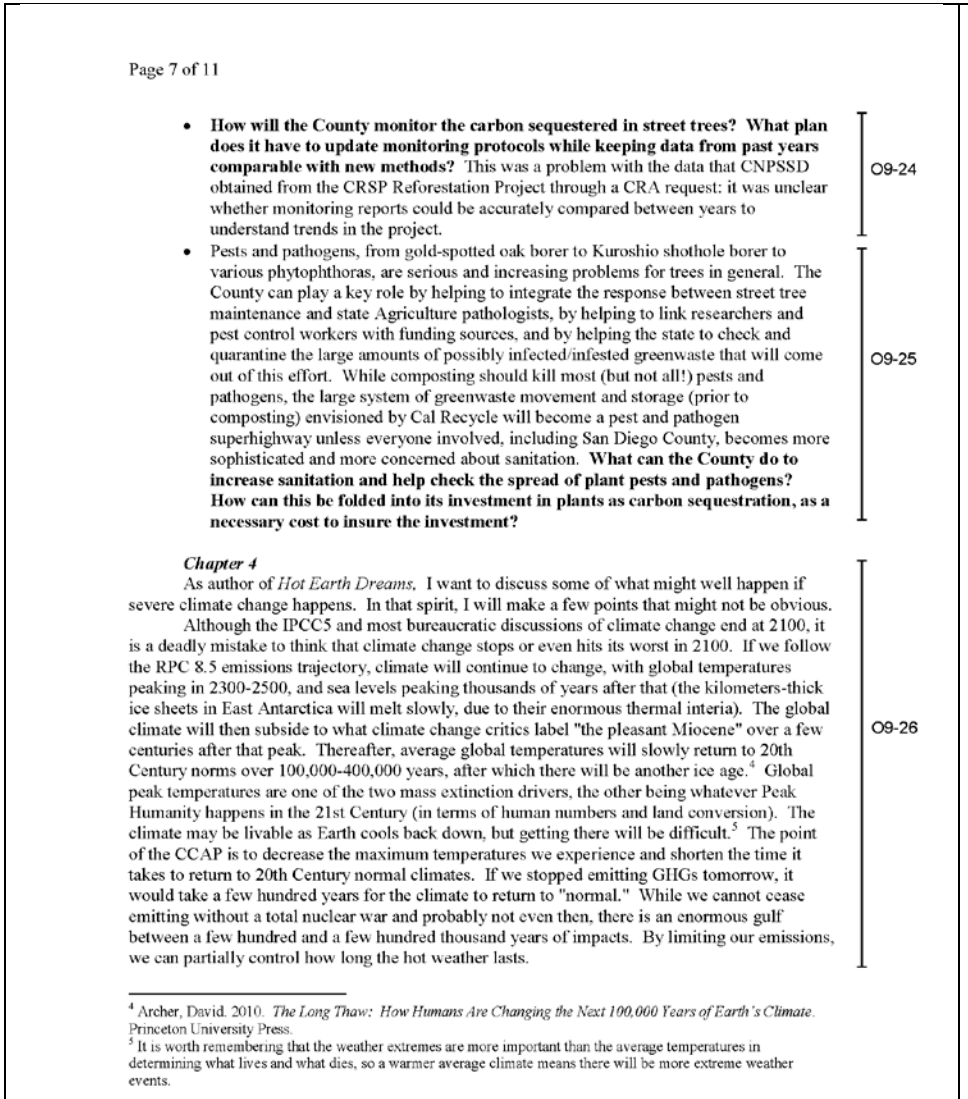
O9-20 The comment references GHG Reduction Measure T-4.1 and "that the County ensure that all potential partners are willing and able to work under the legal limits of the CAP." This comment is unclear. Please refer to Master Response 3 regarding direct investments. The County would implement projects under the direct investment measure for the sole purpose of reducing GHG emissions. The commenter does not

provide any evidence that projects under GHG Reduction Measure T-4.1 would be used for other purposes.

O9-21 This comment expresses concern regarding the efficacy of direct investments and the carbon offset registries relied on to track and ensure emissions are reduced pursuant to GHG Reduction Measure T-4.1. Please see Response to Comment O9-13 and Master Response 3.

O9-22 This comment expresses support for tree planting efforts in the CAP but suggests that closer attention should be paid to site design to minimize conflicts with renewable energy systems. Each future discretionary project would have to evaluate the effectiveness of PV at final engineering and final landscape planning. This comment does not address the adequacy of the Draft SEIR and, therefore, no further response is required or necessary. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.

O9-23 This comment expresses concern about the potential loss of street trees. Please see Response to Comment O14-13 on the performance-based standards required by carbon offset registries, such as CAR. No specific comments were raised on the adequacy of the Draft SEIR. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.



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- **How will the County monitor the carbon sequestered in street trees? What plan does it have to update monitoring protocols while keeping data from past years comparable with new methods?** This was a problem with the data that CNPSSD obtained from the CRSP Reforestation Project through a CRA request: it was unclear whether monitoring reports could be accurately compared between years to understand trends in the project.
- Pests and pathogens, from gold-spotted oak borer to Kuroshio shothole borer to various phytophthoras, are serious and increasing problems for trees in general. The County can play a key role by helping to integrate the response between street tree maintenance and state Agriculture pathologists, by helping to link researchers and pest control workers with funding sources, and by helping the state to check and quarantine the large amounts of possibly infected/infested greenwaste that will come out of this effort. While composting should kill most (but not all!) pests and pathogens, the large system of greenwaste movement and storage (prior to composting) envisioned by Cal Recycle will become a pest and pathogen superhighway unless everyone involved, including San Diego County, becomes more sophisticated and more concerned about sanitation. **What can the County do to increase sanitation and help check the spread of plant pests and pathogens? How can this be folded into its investment in plants as carbon sequestration, as a necessary cost to insure the investment?**

O9-24

O9-25

Chapter 4

As author of *Hot Earth Dreams,* I want to discuss some of what might well happen if severe climate change happens. In that spirit, I will make a few points that might not be obvious.

Although the IPCC5 and most bureaucratic discussions of climate change end at 2100, it is a deadly mistake to think that climate change stops or even hits its worst in 2100. If we follow the RPC 8.5 emissions trajectory, climate will continue to change, with global temperatures peaking in 2300-2500, and sea levels peaking thousands of years after that (the kilometers-thick ice sheets in East Antarctica will melt slowly, due to their enormous thermal interia). The global climate will then subside to what climate change critics label "the pleasant Miocene" over a few centuries after that peak. Thereafter, average global temperatures will slowly return to 20th Century norms over 100,000-400,000 years, after which there will be another ice age.[4] Global peak temperatures are one of the two mass extinction drivers, the other being whatever Peak Humanity happens in the 21st Century (in terms of human numbers and land conversion). The climate may be livable as Earth cools back down, but getting there will be difficult.[5] The point of the CCAP is to decrease the maximum temperatures we experience and shorten the time it takes to return to 20th Century normal climates. If we stopped emitting GHGs tomorrow, it would take a few hundred years for the climate to return to "normal." While we cannot cease emitting without a total nuclear war and probably not even then, there is an enormous gulf between a few hundred and a few hundred thousand years of impacts. By limiting our emissions, we can partially control how long the hot weather lasts.

O9-26

[4] Archer, David. 2010. *The Long Thaw: How Humans Are Changing the Next 100,000 Years of Earth's Climate.* Princeton University Press.

[5] It is worth remembering that the weather extremes are more important than the average temperatures in determining what lives and what dies, so a warmer average climate means there will be more extreme weather events.

O9-24 This comment expresses interest in how the County will monitor carbon sequestration efforts in street trees. Please refer to Master Response 3 on direct investments and Master Response 11 regarding carbon sequestration. On the adequacy of direct investment protocols see response to comment O14-13 and Draft SEIR Chapter 2.7 and Appendix B of the SEIR.

O9-25 This comment expresses interest in seeing the County do more to monitor and control plant pests and pathogens to ensure that tree planting efforts are successful. The County acknowledges this comment. No specific comments were raised on the adequacy of the Draft SEIR. However, in an effort to be responsive, the following is noted. As a component of the Gold-spotted Oak Borer (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.

O9-26 This comment provides an overview of the effects of climate change according to the commenter and generally suggests that the CAP should use a different GHG emissions model. The CAP uses emission factors, models, and protocols that are consistent with those used in CARB's most recent inventory and those accepted industry wide for consistency. RCP 8.5 is not an inventory model. It is a global climate scenario model under high emissions that is used to predict temperature changes. This is done at a global level, not local and would

	therefore be inappropriate for use by the County in preparing a CAP.

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Second, the IPCC's RCP 8.5 model of greenhouse gas ("GHG") emissions is the path that global emissions are currently following, and it is what the CCAP is designed to help avoid, which is well and good. Even though renewable energy is growing rapidly, it is a mistake, especially in this edition of the CCAP, to assume that we can avoid RCP 8.5. The problem is that releases of methane and CO_2 from thawing Arctic permafrost and submarine clathrates could easily overwhelm any reductions in industrial emissions, as there is far more GHG locked up in the permafrost than we have already emitted. And these emissions were not evaluated in the IPCC5 because they were and are insufficiently known, although the problem was noted. This is ***not*** to say that the CCAP is useless—it is vital. However, if the worst predictions for Arctic emissions come true, in a few decades we will no longer be in the driver's seat on GHG emissions. **Until Arctic GHG emissions are proven not to be a serious threat, I strongly suggest using the RCP 8.5 model as the standard baseline for all CCAP efforts until more accurate models become available.**

O9-26 cont.

Third, it is relatively easy to create a crude estimate of what would happen to San Diego County in the face of severe climate change, beyond what was portrayed in Chapter 4. The average temperatures will increase, driven by more heatwaves, while precipitation will become more unpredictable, driven by long-lived oceanic high pressure ridges blocking storms and great storms that happen to hit us, whether they are winter storms or summer cyclones. This is currently the weather that central Baja experiences. The coastal climate will increasingly favor inland and desert vegetation, and many of the coastal species will move north or disappear. Currently San Diego has around 3,300,000 people, and we depend almost entirely on imported water, food, power, supplies, and even people. As the global infrastructure shatters under disaster after disaster, San Diegans will have to survive increasingly on local resources. The last time we did that was in the late 19th Century, and the population then was around 100,000, or under the Indians, around 20,000. While I hope we find ways to keep more people around, San Diego's population, especially if it was limited to whatever water will be in our rivers, will fall by over 90% over the course of this century. That is a future I hope we all want to avoid.

Fourth, I and many others currently have the bad habit of judging current profit, comfort, and convenience against the cost of decarbonizing our lives, and I am afraid this approach underlies parts of the CCAP. It is an incorrect comparison. Just as our ancestors suffered and struggled to make better lives for us, their descendants, we need to evaluate the suffering and struggles of reducing our emissions again the the suffering and death of future generations. Under a RCP 8.5/business as usual future, GenXers like myself may live relatively comfortable lives (at least until 2035 or so), only to watch our children struggle and fail to make comfortable lives of their own, our grandchildren struggle with famine and collapse, and (if we unhappily live long enough) to watch few if any grandchildren born at all, as people leave and San Diego shatters. It may sound silly for an environmentalist to say that this is a problem, since I am only supposed to advocate for native plants, but it is a real problem for everything . What happens to the wildlife when infrastructure collapses? Starving people will forage anything edible and burn anything burnable to cook it. **While the disappearance of civilization will be good for "wilderness," the process of collapse may well drive many species extinct, especially if they are also suffering in a rapidly changing climate and confined to small urban and suburban preserves.**

O9-27

How much is avoiding this future worth, in terms of our present discomfort? That is what I see as the basis for the CCAP. Fortunately or unfortunately, San Diego developed almost entirely in a time when fossil fuels were cheap. Transforming our gas-dependent sprawl into a

O9-27 The comment provides an opinion about future impacts in the region because of climate change. This comment is acknowledged. The CAP describes the possible effects of climate change on the unincorporated area as discussed on pages 4-1 through 4-12. No specific comments were raised on the adequacy of the Draft SEIR. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.

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city powered entirely by electricity in a hotter, less predictable environment, where less resources are available per person, is a bigger challenge than growing a horse-powered town into an automobile metropolis, *simply because we won't have a massive supply of cheap fossil fuels to accomplish the change.* I think we can do make this worthwhile transformation, but I don't think it will be easy or simple. Simplifying ("streamlining") oversight on this process is unlikely to be a good idea. O9-27 cont.

There are also additional comments on Chapter 4 from CNPSSD.

First, preparing for increased wildfire risk requires the following actions to be taken by the County:

- not putting people in harm's way, by not allowing low density development in high fire areas and by insuring that there are roads enough to evacuate people (a serious problem with Lilac Hills Ranch).
- Promulgating Fire Safe landscaping guidelines that are put out by CalFire and others. These are readily available, yet the developers of Lilac Hills Ranch and many other leapfrog sprawl communities seem to never have heard of them.
- Promulgating fire safe building designs, with such simple features as the screened roof events that Supervisor Horn so disliked.
- Educating County residents *repeatedly* about how to minimize risks, as is done with everything from floods to earthquakes.

O9-28

The point here is that simple changes can have enormous impacts. While it appears to infringe on people's rights to ask them to build safely, if we all are required to pay for the fire protection on their homes, and their bad design choices endanger their neighbors homes as well as their own, then they have to find ways to share the burden around and be responsible community members.

Chapter 5 Implementation and Monitoring

First, we are concerned with the statement that the County will use Measure T-4.1 (direct investments) to achieve equivalent reductions if a particular measure is not adopted by the Board of Supervisors. This appears to be an way to amend the CCAP on the fly. As noted above, there are legal issues that may need to be resolved before this method can work, and committing to it as a backstop is problematic. **What other measures can be taken in case a measure is not approved and off-sets cannot be purchased? Are other identified measures flexible enough to take up the slack in sequestration?** O9-29

Second, while it sounds reasonable to tier off the CCAP and streamline future projects whose greenhouse gas emissions are in line with the CCAP, there are two issues with this. First, as noted above, there may be a tendency to allow projects to "vague" their way into streamlining, as Newland Sierra may have done with their mitigation proposals. **How can the CCAP and SEIR be modified to explicitly require quantification of proposed mitigations, proposed reductions of GHGs, on-site electricity generation, and off-site credits? Second, what if the CCAP does not hit its proposed targets? Won't projects that attempt to tier off a non-compliant CCAP be considered to have significant impacts? What steps can be taken to resolve these issues?** O9-30

SEIR Comments

We found seven issues that we commented on. The first is that the SEIR will need to be revised to match any revisions in the CCAP, particularly in terms of direct investment and in O9-31

O9-28 The comment provides suggestions about what the organization would like to see included as design features to mitigate wildfire. The County acknowledges this comment. The CAP describes the possible effects of climate change on the unincorporated area as discussed on pages 4-1 through 4-12. Additionally, the County's Consolidated Fire Code implements existing fire design measures and regulations. No specific comments were raised on the adequacy of the Draft SEIR. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.

O9-29 This comment requests more information about how GHG Reduction Measure T-4.1 would be used to fill emissions gaps. Please refer to Master Response 3 regarding direct investments and Response to Comment O14-13.

O9-30 The comment expresses several concerns regarding the County's ability to extend CEQA streamlining privileges under section 15183.5 of CEQA Guidelines. To the first point in the comment, for projects to be considered consistent with the CAP, applicants must demonstrate this consistency by providing a completed *Consistency Review Checklist*, a copy of which was released with the Draft CAP and Draft SEIR. This Checklist requires that applicants produce substantial evidence that supports a project's compliance with CAP measures to receive streamlining benefits. If a project cannot demonstrate compliance with CAP measures, a complete project-specific GHG emissions analysis including mitigation as needed, must be prepared. In the case of GPA projects, they are provided a processing path for compliance as described on pages 2.7-37 through 2.7-40 of the Draft SEIR. In all cases, projects are required to quantify their emissions and demonstrate through substantial evidence that mitigation would reduce emissions as needed.

The comment also 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 commenter suggests that if the CAP is underperforming, projects that are consistent with the CAP

	Checklist should be found to have significant impacts. The County disagrees with the commenter's assertion for several reasons. Please refer to response to comment O11-3 and Master Response 10 for 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 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 would be implemented at a much larger scale. The CAP would 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 would 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, because monitoring and implementation efforts will occur as designed, the CAP would continually serve as a streamlining mechanism for cumulative GHG analyses consistent with CEQA Guidelines 15183.5.
	O9-31 The comment asserts that any changes made in the CAP must also be reflected in the Draft SEIR. Please refer to the Recirculation Findings which are attached to the Planning Commission Hearing Report which describes changes to the Final SEIR and refer to the Errata which is attached to the Board of Supervisors Hearing Repot which details changes made to the CAP after public review. There are no changes to the SEIR as a result of this comment.

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terms of acknowledging the existing carbon already sequestered in the County. While this is obvious, **what can the County do to insure that this happens?** O9-31 cont.

The second issue is one of communications. This was particularly evident in the biological impacts section of Chapter 2. It did not appear that the author(s) realized that lands fell into more than one category. For example, the Pre-Approved Mitigation Area (PAMA) of the NC-MSCP largely follows undeveloped watersheds and roads, as these are two of the only remaining classes of undeveloped lands in the north County. While there are some riparian areas outside the PAMA, most impacts to riparian lands would almost certainly be impacts to PAMA lands within the MSCP. Unfortunately, the SEIR declared that there were no significant potential impacts to the MSCP, while there were significant potential impacts to riparian areas and wetlands. This appears to be an example of siloed, linear thinking, when the need is for lateral thinking across categories. O9-32

To fix the problem, I strongly suggest including maps in the SEIR. The point of these maps is to show which lands fall into which categories, primarily so that the analysts will realize that many of the lands affected by the CCAP fall into multiple categories, and that their analyses therefore need to laterally link these areas. Moreover, the maps will probably show that a few areas are vital to the CCAP, while many others are not. That part of the analysis is totally lost in the SEIR biology section as written. **What can be done to improve the biology section?**

Third, CNPSSD is increasingly concerned with how native plants migrate to deal with the changing climate. This will complicate the impacts of CCAP, particularly as old trees and shrubs die and are not replaced by seedlings. Moreover, there are substantial unanswered scientific questions, a big one being determining how plants spread through wildlife corridors, especially in culverts under roads. **What will the County do to help answer these questions, and to implement the lessons learned in the CCAP?** O9-33

Fourth, we believe the impacts of direct investment were incorrectly analyzed. As noted above, in the only CAR program implemented in the County, the CRSP Reforestation Program, project managers actively and repeatedly avoided CEQA analysis. Moreover, their contract required "additionality," which meant in context the planting of new trees rather than the nurturing of existing seedlings. This led to a program of controlled burns and repeated bulldozing to make space for the seedlings planted. This is scarcely a low impact activity. **Why did the County not analyze ALL the proposed investment protocols to determine the individual and cumulative impacts of implementing them?** The CAR Forest Project and Urban Tree Planting Protocols are attached, but all protocols from all possible investments need to be analyzed for impacts and mitigated before the County engages in them. O9-34

Fifth, the impacts if the CCAP fails to meet its goals must be considered. Additionally, as we pointed out above, it is not clear that the emissions goals set by the County actually meet state mandated targets. **What are the impacts of this failure, and how might they be mitigated?** O9-35

Sixth, it is unclear if the CCAP meets the requirements of SB 375. While this is not a plant issue, clustering development around transportation corridors to meet SB 375 frees suboptimal sites in the back country from development, thereby preserving plants. **What are the impacts of failing to meet SB 375, and how might they be mitigated?** O9-36

Finally, there is the specter of large-scale energy developments, rows of wind turbines sparking wildfires every time their transmissions fail, of solar farms taking the place of leapfrog sprawl as a way for developers to try to make a quick return of a piece of land they never should have bought, all of this aided by NIMBYs who do not want solar panels in their neighborhoods. O9-37

O9-32 The first portion of the comment is unclear regarding impacts to the MSCP; the second part of the comment suggests the addition of maps to provide clarity in impact determination. In Chapter 2.4 of the Draft SEIR, significant and unavoidable impacts were identified for sensitive species, riparian habitat, and wildlife corridors and nurseries. Conflicts with Plans, Policies, and Ordinances, including HCPs and NCCPs, was determined to be less than significant because discretionary projects approved after CAP adoption would be required to comply with applicable policies and/or ordinances, such as the Biological Mitigation Ordinance and the Resource Protection ordinance, and permitting procedures related to protection of biological resources. Any project approved after CAP adoption that identifies potentially significant impacts must also identify feasible mitigation measures to minimize if not avoid those impacts. The Draft PAMA of the North County MSCP Plan does contain riparian areas, but the comment offers no detail or verifiable data to support the assertion that direct impacts to riparian areas resulting from CAP implementation will disproportionately impact development and implementation of HCPs/NCCPs (Draft North County Plan or South County Subarea Plan) which appears to be the concern raised by the comment.

To the second portion of the comment, maps depicting CAP applicability are not included in this Draft SEIR because the document is evaluating the potential impacts of implementing the CAP at a programmatic level. The CAP is applicable to all lands within the unincorporated County, excluding those lands not under the County's jurisdiction such as Tribal reservations or National Forest Land. Therefore, a map depicting the area of CAP applicability would cover most of the unincorporated County including all of the riparian areas therein, and would not reveal greater or lesser severity of impacts to riparian areas than has been discussed in section 2.4 of the Final SEIR which was determined to be significant and unavoidable for potential impacts to riparian areas.

O9-33 The comment expresses concern about how the effects of climate change will ultimately result in changing ecosystems.

	The County acknowledges this comment. The County has in good faith, prepared a CAP which attempts to accurately describe the possible physical impacts of climate change, and establishes a series of actions and strategies that are within the County's control to reduce GHG emissions. The County does not have data regarding the commenter's specific point of concern, and therefore no further comment is required or necessary. No specific comments were raised on the adequacy of the Draft SEIR. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.
	O9-34 The comment expresses concern about the potential impacts associated with implementing direct investment protocols. This comment is acknowledged. As described on pages 2.7-23 through 2.7-27, the direct investment program would be established by the County by 2020 as a future discretionary action. If the CAP is adopted the County would determine which protocols would be feasible to implement in the County, and would undertake a separate CEQA evaluation at the time of the establishment of the program if required. Because the specific nature and locations of protocols are unknown at this time, the Draft SEIR evaluates at a programmatic level, the potential physical impacts that could result from the direct investment projects that may be considered by the County. The potential physical impacts that could occur as a result of implementing direct investments are evaluated within each subtopic of the Draft SEIR. For additional information about the direct investment program, please refer to Master Response 3 - direct investments. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.
	O9-35 The comment requests clarification about what would happen if the CAP fails to meet its established goals. Refer to the second portion of response to comment O9-31. This comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project.

	O9-36 This comment expresses concern about whether the CAP is consistent with SB 375. Please refer to Master Response 2 regarding the CAP and consistency with SB 375. **O9-37** This comment is unclear and does not address the adequacy of the SEIR. Therefore, no further response is required or necessary.

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What combination of education, outreach, and regulation can the County employ to keep our adaptation to the 21st Century from turning the County into a dusty industrial development, enabled by the CCAP? Where are these impacts analyzed and mitigated? O9-38

Thank you for taking these comments. Please keep CNPSSD informed of all developments with the CCAP and associated documents and meetings, at conservation@cnpssd.org and franklandis03@yahoo.com.

Sincerely,

Frank Landis, PhD
Conservation Chair
California Native Plant Society, San Diego Chapter

O9-38 This comment asks what combination of education, outreach, and regulation can the County employ to keep the adaptation to the 21st Century from turning the County into a dusty industrial development. As detailed in Section 1.1 of the Draft SEIR, the fundamental purpose of the project is to reduce County GHG emissions consistent with state legislative requirements through implementation of a CAP, which includes strategies and measures to reduce community and County local government operations (County operations) GHG emissions. The additional project objectives are outlined within Section 1.1. No further response is required or necessary.