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September 25, 2017

County of San Diego Planning and Development Services

Attn: Ms. Maggie Soffel

Re: Comments on the COUNTY OF SAN DIEGO CLIMATE ACTION PLAN (PDS2015-POD-15-002) AND DRAFT SEIR (LOG NO. PDS2016-ER-16-00-003).

SanDiego350 is an inclusive volunteer organization devoted to inspiring a movement to prevent the worst impacts of climate change and climate injustice. We strive to create a future that supports a livable planet and just society through education and outreach, public policy advocacy, and mobilizing people to take action.

We welcome the opportunity to comment on the County of San Diego Climate Action Plan and Draft SEIR. Thanks to the County staff and consultants for implementing a significant citizen and stakeholder participation component in this process. We appreciate being invited to participate from the inception of the drafting process to its final conclusion. We believe the input of environmental, housing, and community organizations will result in a better plan with wider support for its implementation.

O17-1

Chapter 2 (Greenhouse Gas Emissions, Targets)

The County's decision to use 2014 as the baseline year from which it will calculate GHG emission reductions, based on the specified reduction targets, must clearly demonstrate that this baseline will result in reductions that are comparable to – or greater than – reductions that would use a 1990 benchmark established by AB 32, SB 32, and EOs B-30-15 and S-3-05.

We understand that the County's 1990 GHG emissions data are not sufficient to be used as the baseline for future reductions, but the plan must document comparability to improvement on a 1990 baseline. Why shouldn't this plan establish that 2020 target as the basis for reducing future GHG emissions? According to the draft CAP, it will achieve the "1990 baseline" of 3,147,275 mmtCO₂e by 2020. Shouldn't the plan then base its future targets on this "baseline" rather than the 3,211,505 mmtCO₂e?

O17-2

Response to Comment Letter O17

SanDiego350

David Harris, Public Policy Team

September 25, 2017

O17-1 The comment provides introductory remarks and information about San Diego 350. No further response is required.

O17-2 The comment expresses concern regarding the use of the 2014 GHG emissions inventory baseline instead of the 2020 target. Please see Master Response 4 regarding the GHG emissions baseline.

Chapter 3 Greenhouse Gas Reduction Strategies and Measures

The data provided in the table and figure indicate that a disproportionately low percentage/amount of future GHG emission reductions will derive from the "Transportation and Built Environment" category. This raises questions regarding whether the County's CAP is consistent with and supports the goals and expectations of SB 375 (Regional Transportation Plan/Sustainable Communities Strategy) that prioritizes land use changes and transportation efficiencies to reduce per capita vehicle miles traveled (VMT)-based GHG emissions from passenger and light truck vehicles.

O17-3

Transportation is by far the largest contributor (45%) to its GHG emissions, yet the CAP only proposes to implement measures that would produce a 13% GHG reduction by 2030. While there is no requirement that each emission sector must be reduced proportionate to its contributions, the CAP appears to under-utilize "transportation" sector reduction opportunities, which then places much greater burden to reduce emissions from other sectors. We recommend that the CAP propose a minimum of a 21% GHG reduction by 2030.

Updating Community Plans (Measure T-1.3) to improve housing efficiency (density and affordability) and associated transportation is a strategy that needs more description. This approach is the central tenet of SB 375 regional transportation plan/sustainable community strategy, and the CAP must explain how this approach fits within the larger RTP/SCS for San Diego County (including other CAP measures such as T-2.2). The proposed performance metric should include a brief summary of what criteria the County will apply to the community plan updates as well as reference the documents where the full analyses are presented.

O17-4

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

O17-5

We concur that the County should establish a Direct Investment Program (Measure T-4.1) that provides incentives/rewards for creating "excess" GHG reduction actions to strengthen the likelihood of meeting its GHG emission reduction targets. The CAP should reward innovative and effective opportunities to reduce emissions. Because the County presumes this will have high cost to implement, we are concerned that the County allocate sufficient funding to enact the investment program.

O17-6

A direct investment program cannot be presumed to serve as an unrestricted source for offsetting insufficient GHG emission reductions from other measures that fail to meet their expected performance. The CAP must include a "rough-step" tracking system to monitor and report how closely each of the reduction measures is functioning. If the cumulative GHG emission reduction is not roughly "in step" (e.g., within 10% of the projected overall annual GHG emission reduction), then the use of direct investment options must first demonstrate the offsetting investment measure(s) can be rapidly implemented and produce the necessary reductions.

O17-7

O17-3 The comment expresses concern regarding the CAP's consistency with SB 375. Please see Master Response 2 regarding the CAP and consistency with SB 375. This comment also expresses concern regarding the disproportionate amount of emissions that are attributed to the transportation sector and suggests that the CAP propose a minimum of 21% GHG emissions reductions from that sector by 2030, but does not specifically state why that number should be used as a goal. The County acknowledges this comment. Please see Master Response 9 related to the selection of GHG reduction measures. The CAP contains 11 strategies, 30 GHG reduction measures and supporting efforts organized under five GHG emissions categories. The GHG Reduction Measures that are included in the CAP were chosen based upon many criteria, the most important of which is whether they are within the County's jurisdiction to control. The Built Environment and Transportation category contains measures that would reduce the number and length of vehicle trips through smarter land use planning, increase the use of alternative modes of transportation, and encourage a shift to electric and alternatively-fueled vehicles. As described in Chapter 5 of the CAP, the plan would be adaptively managed, which means that with annual reporting, biannual emissions inventory updates, and updates to the CAP every five years, the County would have the ability to respond to changing technologies and incorporate new approaches to this emissions category as needed.

O17-4 The comment requests more detail regarding how GHG Reduction Measure T-1.3 will be implemented and how this approach fits within the larger context of regional planning in San Diego County and consistency with SB 375. The comment states that GHG Reduction Measure T-1.3 should include more detail regarding how this measure will be implemented. Refer to Master Response 5 regarding community plans. As described on page 3-14 of the CAP, GHG Reduction Measure T-1.3 would require the County to update 19 community plans to achieve mixed-use, transit-oriented village centers (10 by 2030 and 9 by 2050). The County's focus would be on communities that support diverse uses and transit opportunities. This action would require the

County to determine which community plan areas are best positioned to support these types of planning activities and could produce the highest VMT reductions. In implementation of this measure, the County would perform an infrastructure needs assessment and build-out analysis which would form the basis of the plan updates. The County would also conduct public outreach to determine the needs of the community from the public's perspective, and to assess stakeholder support for planning efforts. Regulatory planning efforts to induce the type of infrastructure and development activities that are desired could include rezoning, adoption of design guidelines, and provision of development incentives. These updates would be performed at the individual community scale and may vary across communities depending upon need. As described in Chapter 5 of the CAP, the plan would be adaptively managed, which means that with annual reporting, biannual emissions inventory updates, and updates to the CAP every five years, the County would have the ability to respond to changing technologies and incorporate new approaches to this emissions category as needed.

Regarding the comment about consistency with regional plans and SB 375, the County has prepared the CAP to be consistent with the County's 2011 General Plan Update and other regional plans including SANDAG's San Diego Forward: The Regional Plan. For a more detailed response to this topic, please see Master Response 2 regarding the CAP and consistency with SB 375. The comment will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the proposed project.

O17-5 This comment suggests that shared and reduced parking requirements should apply to all new and redevelopment projects within the County and should be accompanied by alternative transportation options. The County's jurisdiction covers rural and semi-rural lands, along with suburban areas, many of which have limited transportation options and are served by limited transit. Thus, proposed transportation measures in the CAP focus on reducing VMT through improved design of development, infrastructure improvements, travel demand management programs, parking code revisions, and alternative

fuel use. While the nature of trips will likely continue to be personal vehicle based, the fuel source and emissions factors of those trips can be modified by switching to renewable sources including electricity. New GHG Reduction Measure T-3.5 and supporting efforts include facilitating the growth of electric vehicle (EV) charging infrastructure. GHG Reduction Measure T-2.4 will work in tandem with the other measures listed above to facilitate a mode shift to cleaner options. The County may consider extending this shared parking requirement to redevelopment projects in the future. However, please refer to Master Response 9 on selection of measures in the CAP. The County acknowledges this comment. No specific comments were raised on the adequacy of the Draft SEIR. Therefore, no further response is required.

O17-6 This comment expresses support for GHG Reduction Measure T-4.1. The County acknowledges this comment. No specific comments were raised on the adequacy of the Draft SEIR. Therefore, no further response is required. The County has prepared a preliminary assessment of the direct investment program to estimate the costs associated with implementation of Measure T-4.1. Please see the Preliminary Assessment of the County of San Diego Local Direct Investment Program, Ramboll Environ Inc., 2017 report attached to the Planning Commission Hearing Report.

O17-7 This comment expresses concern regarding the use of a direct investment program to offset any shortfalls by other measures in the CAP. Please refer to Master Response 3 on direct investments. As described on page 3-38 of the CAP, the direct investment program would be a flexible tool to ensure that the County can meet its 2030 GHG emissions reduction target. The CAP is set up to be managed adaptively with annual reporting and monitoring requirements which would allow the County the flexibility to adjust if a measure is underperforming.

<p>The establishment of a Community Choice Aggregation (CCA) program should be considered as a high priority to meet GHG emission reduction goals in the energy sector. CCA has been successfully implemented in Marin and Sonoma counties and will be soon get underway in LA County. Several cities in San Diego County are currently considering CCA including Solana Beach and Encinitas. We recommend that the County undertake a CCA feasibility/technical study to be completed in 2018.</p> <p>We support increasing solar photovoltaics (PV); however, past rates of PV installation are no assurance that future installation will continue at that rate. Currently, federal tax credits provide a significant incentive for private residence PV installations – and the County has no control over the continuance of those credits. The County should address the availability of other potential subsidies for solar PV installations.</p> <p>We support the CAP’s approach that includes carbon sequestration. The County should work with nurseries, native plant societies and forest advisory boards/groups to identify species that are effective and appropriate for carbon sequestration and for the unincorporated lands. In particular, tree species that are potentially invasive into surrounding natural areas or require substantial water should not be approved.</p> <p>Chapter 4 Climate Change Vulnerability, Resilience and Adaptation</p> <p>The CAP uses generally accepted/state of CA developed approaches and methods to assess the County’s vulnerabilities to climate changes that are anticipated to result from GHG emissions. Given the range of potential climate change effects on temperatures, precipitation, flooding, wildfires, sea level rise, diseases, etc. the vulnerability assessments are presented in fairly general terms. We recommend that the CAP focus its responses to potential vulnerabilities and threats posed by mid-emission scenarios. The preponderance of evidence from recent/current global emissions monitoring suggests that the “low emission” scenario and its projected climate change effects are less likely to occur; and mid-range or high-range scenarios may be more likely the future condition.</p> <p>Chapter 5 Implementation and Monitoring</p> <p>We agree that the “CAP is a dynamic document that will be continuously assessed and monitored...and to make timely adjustments to existing measures; replace ineffective or obsolete actions; or add new measures as technology, federal and State programs, and circumstances change.” The County is committing to annual reporting, biannual GHG emission updates, and CAP updates every 5 years.</p> <p>While the CAP could be used for the purpose of streamlining future individual projects if their GHG emissions are consistent with or lower than what was identified or expected in the CAP, this raises a serious issue. If the CAP is not meeting its overall commitments, can the CAP serve as a means to streamline future project approvals, even if those projects align with the anticipated level of GHG emissions from its emission sector? This issue must be more fully explained and resolved in the Draft SEIR.</p>	<p>O17-8 This comment expresses support for a Community Choice Aggregation program and suggests that the County begin a feasibility study in the next year. The County acknowledges this comment. The comment does not address the adequacy of the Draft SEIR. The comment will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the proposed project.</p> <p>O17-9 This comment expresses concern regarding the use of historical rates of PV installation to predict future rates of PV installation and suggests that the County should address availability of subsidies that could drive this measure. The County acknowledges this comment. The comment does not address the adequacy of the Draft SEIR.</p> <p>However, in an effort to be responsive, the following is noted. The historical PV installation rate in the unincorporated area was driven not only by incentives, but by the County’s effort to streamline the process through the Renewable Energy Ordinance which allows homeowners to install up to 500 square feet of PV without a building permit. In addition, awareness about the cost effectiveness of solar facilities has risen, along with incentive programs offered by the State. The County agrees that it cannot control the availability of incentives; however, based upon recent adoption of SB 350 (which further illustrates the State’s commitment to increasing energy efficiency), incentive programs may continue. Additionally, CARB’s The 2030 Scoping Plan Update indicates that to achieve the State’s 2030 GHG emissions reduction targets, continued investment in renewables, including solar roofs, wind, and other distributed generation will be required. The County does not currently have information related to the availability of incentive programs but will coordinate with other agencies to make that information widely available as it becomes known.</p> <p>As described in Chapter 5 of the CAP, the plan would be adaptively managed, which means that with annual reporting, biannual emissions inventory updates, and updates to the CAP every five years, the County would have the ability to respond to</p>
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changing technologies and incorporate new approaches to this emissions category as needed.

O17-10 This comment expresses support for the CAP's efforts to expand carbon sequestration opportunities through tree planting and suggests that the County should work with local nurseries, native plant societies, and advisory groups to identify tree species that are particularly well-suited to the region. Please refer to Master Response 11 regarding carbon sequestration. The comment does not address the adequacy of the Draft SEIR. The comment will be included as part of the Final EIR and made available to the decision makers prior to a final decision on the project.

O17-11 The comment suggests the County's vulnerability assessments use mid-emission scenarios. Please refer to response O1-39.

O17-12 The comment suggests that if the CAP is not meeting its projected GHG emissions targets, the County may not use it to streamline projects even if they are consistent with the 2011 GPU. Please refer to response to comment O11-3. The County disagrees with the commenter's assertion for several reasons. 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 will be implemented at a much larger scale. The CAP will be implemented through a combination of regulations, programs, incentives, outreach, and educational activities and County efforts complement and build on other federal and State efforts to reduce GHG emissions. In other words, implementation of the CAP and achievement of the 2030 target and 2050 goal will be a county-wide effort.

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

Thanks for considering our comments. If you have any questions, please contact me at 858-663-1457 or davidh@sandiego350.org

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Sincerely,

David Harris
San Diego 350 Public Policy Team

O17-13 The comment provides closing remarks. No response is required.