From: Kazmer, Gregory
To: Kelly Bray
Cc: Poonam Boparai; Amanda Olekszulin
Subject: FW: CLMPG, formal comments, San Diego County Climate Action Plan
Date: Monday, October 02, 2017 10:39:31 AM
Attachments: CAP comment letter CLMPG.pdf

Can you please review this late letter and give me a call when you have a second? Thanks!

Greg Kazmer, Land Use/Environmental Planner
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-----Original Message-----
From: De La Rosa, Michael
Sent: Monday, October 02, 2017 10:12 AM
To: Kazmer, Gregory <Gregory.Kazmer@sdcounty.ca.gov>
Cc: Kopaskie, Mary <Mary.Kopaskie@sdcounty.ca.gov>; Soffel, Maggie <Maggie.Soffel@sdcounty.ca.gov>; Talleh, Rami <Rami.Talleh@sdcounty.ca.gov>
Subject: FW: CLMPG, formal comments, San Diego County Climate Action Plan

Here you go

-----Original Message-----
From: BillieJo Jannen [mailto:jannen@slashmail.org]
Sent: Saturday, September 30, 2017 4:20 PM
To: De La Rosa, Michael
Subject: CLMPG, formal comments, San Diego County Climate Action Plan

Attached

From: Billie Jo Jannen, Chairman,
Campo Lake Morena Community Planning Group

To: Michael de la Rosa, Group Program Manage
San Diego County Planning and Development Services

September 15, 2017

Re: Campo Lake Morena Planning Group comments Draft Climate Action Plan

Dear San Diego County Officials and Staff:

These are our formal comments on the current draft of the county's CAP project. To summarize the detailed comments below: While there are many good ideas in the draft, the collection of formal comments -- and public outreach in general -- are severely lacking. In addition, many of the suggested initiatives fail to account for limitations and general conditions in rural communities, and would create an unequal burden on rural residents struggling to comply.

Chapter 6: Public Outreach and Engagement

Planning groups received only a notification that the plan was released. When asked to attend a meeting and present/answer questions, staff refused, stating that **no planning group presentations were planned or would be provided**. The public meeting nearest to the backcountry was in Alpine, which would force backcountry residents to travel 40-plus miles one way to attend. And that's assuming they even know the meetings are taking place. How would they when staff has focused most of its efforts on moneyed special interests in town?

A later plan – offered after I pointed this out – is to present to the chairmen alone at a morning meeting many miles away from the affected communities. This forces chairmen to become the presenters in their communities, whether they know the material or not, and will likely result in very limited comment response from community groups. This entirely fails to honor the purpose and value of planning and sponsor groups, which were created to provide local input on important planning issues like this one.

I would direct your attention to **pages 9-13 of the county's Policy I-1**, which explains the role of staff and planning/sponsor groups when making amendments to community and regional plans. This plan proposes multiple amendments to community and regional plans. I posit that **the county is in violation of its own policy** in failing to properly consult planning/sponsor groups, as laid out in the I-1. This becomes even more important, when you consider that the county intends to force changes to a number of community plans to fit the CAP and CREP. It has already done so in Boulevard, setting the stage for catastrophic changes in the community.

None of the planned meetings provide anything beyond information. No formal comments were, or will be, gathered at any of the public meetings. Residents are on their own to figure out the comment process and try to wade through two massive documents in time for the comment deadline of a mere 45 days.

Unfortunately, this timeline gave our group only enough time to get through the CAP, with no time available for anyone to slog through the DEIR

Please extend the comment deadline on both the CAP and its DEIR and remedy the failure to seek formal input from planning groups, as outlined in county policy.

Chapter 2: Greenhouse Gas Emissions Inventory, Projections and Reduction Targets

Under-reported emissions from clearing
Electricity emissions exclude most of the releases from clearing for industrial-scale wind and solar, causing the electricity emissions portion of both the CAP and the DEIR to be grossly under-reported. This is overlooking many tons of CO2 being released in the name of reducing CO2 emissions. Researchers – many of them local to Southern California and San Diego County - have studied and quantified the amounts of carbon sequestered in soil and vegetation. The carbon sequestered in soil often far outweighs that found in surface vegetation and is permanently destroyed when heavy equipment is brought to bear.

Staff assigned to the CAP project has informed CLMPG that soil sequestration is too new a concept to allow it to be included in GHG calculations, so only surface vegetation is counted in the required assessment. **We reject this reasoning.** The fact that the ponderous state process has failed to provide a complete tool, is no reason for county staff to neglect consulting with the scientists who have been working for at least a decade on soil sequestration accounting (*see "Supporting Information" below my signature*).

If retention of GHGs is substantial enough, natural sequestration may actually be a more economical route to achieve a solid reduction in atmospheric GHGs than sacrificing that capacity for the sake of hundreds or thousands of acres of expensive industrial-scale renewables. Ignoring this is inexcusable, especially when the county is considering a renewable energy overlay that would displace hundreds of acres and thousands of tons of sequestered carbon.

Sequestration information is valuable for decision makers and should be covered in detail in the CAP, the CREP and individual project EIRs.

No assessment of real carbon costs in either the CAP or the DEIR
The report attributes projected reductions over 30 years to "cleaner electricity generation, improved energy efficiency in buildings, and more fuel efficient vehicles," essentially assuming these benefits, rather than quantifying them.

In fact, the GHG release for plug-in cars may be greater than if drivers continued to run high efficiency gasoline engines. (*See "Supporting Information")* The carbon savings of electric cars depends on the source of the electricity used to charge them. If it comes from a fossil fuel generator, you have saved nothing.

In addition, the cradle-to-grave carbon costs of wind turbines are ignored. The report blithely adopts the politically correct assumption that electric cars and wind turbines will automatically be less carbon and pollution intensive, while scientists in the field are finding that this may not necessarily be so. (*See "Supporting Information")* Ask the Chinese

farmers whose land and communities were destroyed by rare earths mining for U.S. turbines how "clean" renewable energy is (*See "Supporting Information"*). While the plan acknowledges that emissions are a global impact – and not just a local one - it utterly ignores the nature and magnitude of those same global impacts.

Everything that staff has produced on construction of renewable energy fields has ignored and glossed over the real and permanent impacts of using wildlands in this manner. Programmatic EIRs for zoning overlays, the 2012 wind turbine policies, and now this one, float over the environmental issues with the promise that all projects will be thoroughly examined on an individual basis. The 2012 Wind Energy EIR, even goes so far as to claim that some large wind turbine projects would not violate any air quality standards or contribute substantially to an existing or projected air quality violation because of their size (CAP PEIR, page 2.3-29). At the same time, project review regulations continue to give wind turbine developers a pass on part of the impacts.

Please include cradle-to-grave pollution costs when assessing industrial-scale renewables, both in this project and in proposed private-sector projects. Please do more accurate accounting on the value of electric cars.

Incomplete information on small producers/distributed generation
The report considered only usage under the records of a single supplier. Self-generation from non-industrial, privately owned systems (distributed generation) is not quantified. Without quantification, the GHG savings of renewables built into new and existing housing and commercial projects cannot be properly understood by planners. If it's not properly understood by planners, then no one has any way of knowing what it will take to get to the goals outlined in the CAP.

The report should offer better analysis on local generation in areas where it will minimize both transmission losses and destruction of sequestration in currently undisturbed areas. The capacity for small-scale solar and wind generation in cities and suburban sites hasn't even begun to be tapped. This has been largely ignored in favor of preserving a business model of energy generation and distribution that hasn't changed since it was established in the late 1800s.

Please quantify past growth of small-generation capacity, project its expected growth over time, and design policy/regulations to take advantage of this asset.

Transmission losses from distant wind and solar fields are ignored. Excess generation required to replace long-distance transmission losses is not acknowledged or addressed. As industrialized energy generation in ever more far-flung locations increases, these transmission losses will also increase. How can these losses be mitigated when no one has even bothered to try to quantify them?

Please provide a realistic assessment of transmission losses.

Chapter 3: Greenhouse Gas Reduction Strategies and Measures

During the 2016 workshop conducted with planning and sponsor group chairmen when the new CAP was being started, staff received a great deal of detailed input from rural

chairmen, but little of it appears in the report. The report takes a one-size-fits-all approach in its policy recommendations and little effort was made to assess how they could be implemented in far-flung communities.

For example, forcing clustered "village" style development on low-density rural communities can be expected to create MORE emissions, as communities that don't have the population to support businesses will still shop down-mountain -- and so will the hundreds of new residents plopped down in homes that are 40 to 50 miles from stores and jobs. In these cases, slow growth is the better option for keeping GHG emissions down.

Another example: mass transit is virtually non-existent in the backcountry, and the rural service is prohibitively expensive. Most backcountry people do not use bikes or foot travel to get to stores or work, due to distances. Assumed reductions in the report won't come from rural communities and it is misleading to imply that they will.

Please revise the report, proposed regulations and PEIR to account for the massive differences between regulatory affects in rural and urban communities.

Water and gas pressure for on-demand hot water
The report calls for new regulations that force people to switch to tankless water heating. This might work in town where water and natural gas are delivered at standardized pressures and volumes. Thousands of residents outside of the county water authority line do not receive water at a standardized pressure and do not have access to natural gas. Many use gravity feed systems, which may not achieve the pressure needed for on-demand systems to operate properly. This regulation could force thousands of people to install additional expensive pressure-boosting equipment in order to comply.

Please rewrite this policy to clarify exceptions for people who are unable to comply with it due to water pressure and lack of natural gas. Please consult directly with affected communities to identify other areas where compliance would be a disproportionate burden.

The benefits of distributed generation are underemphasized in this plan's regulatory changes, costing taxpayers/ratepayers millions every year
Poor choices in strategies benefit no one but the power industry, which will continue to have its obsolete business model shored up by local regulation. **The CAP delays implementation of electricity generation on new housing by two years, and that for commercial construction by 12 years**. Why? We could almost entirely offset usage due to population increases, providing a steady increase in renewable generation *without disturbing soil and vegetation to build industrial generation capacity*. Delaying this can only deprive us of thousands of kilowatt-hours of electricity per year. Onsite generation by new housing and commercial projects would reduce transmission losses drastically, since excess energy need be shipped no further than the neighbors' homes and businesses.

The county should immediately require that all new subdivisions must construct on-site renewable generation equal to the expected needs of the subdivision's homes and cars. A similar requirement should be placed on commercial and industrial permits.

Please rewrite proposed regulations to <u>immediately</u> require 100 percent on-site energy generation in all new subdivisions, commercial projects and industrial projects.

Excess generation needed to replace long-distance transmission losses from renewable energy is not properly quantified or mitigated in either the CAP or DEIR.
Measure E-2.1 in the supplemental EIR requires 90 percent renewable energy in the unincorporated area by 2030. In San Diego County, industrial scale renewable energy is generated in fields far from its users. The energy bypasses local users, and is transported to town. It is then transported back out to users many miles away -- some, ironically, located adjacent to wind and solar farms.

The report never even mentions transmission losses, which can be substantial – as much as 40 percent – and could render pointless the vast amounts of money, greenhouse gas releases, and relentless rate increases associated with industrial-scale renewables. When generation is located so many miles from the majority of end users, it adds millions annually to the cost of providing electricity. **Placing an energy generation overlay on distant sites guarantees that this waste will continue and increase, when we *should* be *decreasing* energy waste.**

Glossing over the substantial element of transport losses in the CAP and DEIR is a blot on the report's credibility and counters the benefit of the millions spent on energy-saving upgrades in thousands of homes. How can county staff claim that its plan reduces GHGs when it doesn't even know how much is being wasted in transport versus how much could be saved if generation were taking place in the neighborhoods where it is needed?

Please do a correct and full assessment of real carbon costs of wind, solar and natural gas generation and transmission and write regulations that fit the facts.

Sincerely

Billie Jo Jannen

CC:
District 2 Supervisor Dianne Jacob, Chairman, San Diego County Board of Supervisors
Leon Brooks, Chairman, San Diego County Planning Commission

Supporting Information

Every industrial renewable project we have seen in Southern California sports vast tracts of desertified soils that have lost their ability to hold carbon and nitrogen. Researchers have been reporting for over a decade on the long-misunderstood capacity of arid and semi-arid systems to hold on to nitrogen- and carbon-based gases. In fact, semi-arid soils can hold substantial carbon and nitrogen – often more than the surface vegetation.
www.californiachaparral.com/images/Luo_et_al_Chaparral_as_carbon_sink_2007.pdf
http://ag.arizona.edu/oals/ALN/aln49/lal.html#desertification

Soil microbes and vegetation substantially increase the amount of carbon that arid soil holds onto in response to increased amounts of carbon.
http://phys.org/news/2014-04-arid-areas-absorb-unexpected-amounts.html

Unimpaired natural systems will not only hold the carbon they have, but will hold even more in future, making them an irreplaceable GHG-buffering resource.
www.currentscience.ac.in/Volumes/106/10/1357.pdf

Once degraded, soil is unlikely to regain its ability to sequester GHGs. Surface landscaping does not replace the naturally evolved plants and microbes.
(http://onlinelibrary.wiley.com/doi/10.1111/gcb.12957/abstract)

Wind and water erosion on compacted and stripped off lands removes the finer particles needed for effective sequestration.
http://citeseerx.ist.psu.edu/viewdoc/download;jsessionid=D4A41F4B3C9A972A5610DACD64AECA27?doi=10.1.1.493.3931&rep=rep1&type=pdf

Energy developments usually use rated (nameplate) capacity, rather than efficiency capacity, to describe their projects. However, projects will never produce to nameplate capacity. The public is given the impression that it's receiving (for example) 10 megawatts, when in reality, it's getting 3, and the other 7 are coming from a fossil fuel peaker plant:
https://www.eia.gov/tools/faqs/faq.cfm?id=101&t=3
www.eia.gov/totalenergy/data/annual/pdf/sec17.pdf

Explanation and calculations for transmission and distribution losses can be found on several websites. For example:
http://electrical-engineering-portal.com/total-losses-in-power-distribution-and transmission-lines-1
https://www.eia.gov/tools/faqs/faq.cfm?id=105&t=3

The greenhouse gases and dirty pollutants released in mining, smelting, transport and casting the materials for turbines and solar panels measures in thousands of tons, while rare earths mining and processing is outright catastrophic:
http://web.mit.edu/12.000/www/m2016/finalwebsite/problems/environment.html
http://e360.yale.edu/feature/boom_in_mining_rare_earths_poses_mounting_toxic_risks/2614/

Well-designed gasoline engines are producing fewer GHGs than electric cars.
http://www.windtaskforce.org/profiles/blogs/comparison-of-energy-efficiency-and-co2-of-gasoline-and-electric

Achieving the oft-stated goal of getting 20 percent of U.S. electricity needs from wind by 2030 would require a total expenditure of more than $850 billion. Yet, the likely carbon-dioxide savings from that expenditure would be just 2 percent of global emissions in 2030.
www.manhattan-institute.org/pdf/ib_11.pdf

A collection of renewable energy reports by scientists and engineers who specialize in energy efficiency and greenhouse gas reduction methods:
http://www.coalitionforenergysolutions.org/research_and_reports.html