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**Sent:** Tuesday, December 26, 2017 1:52 PM

**To:** CAP <CAP@sdcounty.ca.gov>

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**Subject:** Rehear or appeal the Sierra Club CAP court case

Recently it's become clear that EPIC's estimates of County GHG emissions are faulty calling the entire CAP process into question. See this UT article. This has been the case in San Diego and also La Mesa:

<http://www.sandiegouniontribune.com/news/environment/sd-me-climate-plan-vmt-20171129-story.html>

The entire CAP process should be delayed until a method of independently verifying that these estimates are accurate can be developed. Hundreds of million dollars may be a stake.

If the court case against the County has used EPIC's estimates it should be reheard or appealed.

Fully quantified data and scientific proof the County's GHG emissions are significant under CEQA Guidelines 15064(b) should also require a rehearing/appeal of the case. This has not been done previously, violating the intent of CEQA.

The intent of CEQA is to fully inform the public. Thus a fully quantified cost and benefit analysis of any mitigation proposals should be included in the CAP.

The Schwarnegger 80% GHG reduction by 2050 executive order S-3-05 should be removed from the court case and also any CAP calculations as it was rejected by the state Supreme Court in July.

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In a message dated 8/25/2017 5:13:06 PM Pacific Standard Time, [johnsuhr@aol.com](mailto:johnsuhr@aol.com) writes:

On review the updated draft CAP notes County GHG emissions at 3.2 MMTCO<sub>2</sub>e annually for a population of 460,000 or  $3,200,000/460,000 = 6.96$  MMTCO<sub>2</sub>e/capita. Note that the CARB 2030 Scoping Plan recommends 6 MMTCO<sub>2</sub>e/capita based on the 40% SB 32 GHG reduction requirement so the County need only reduce emissions 0.96 MMTCO<sub>2</sub>e /capita or  $0.96 \times 460,000 = 0.44$  MMTCO<sub>2</sub>e to meet that recommendation.

Also I had previously used 4.5 MMTCO<sub>2e</sub> for County emissions instead of 3.2 MMTCO<sub>2e</sub> so the revised reduction of global temperatures if the County ended emissions entirely would be  $3.2/7800 = 0.00041 \times 0.007 = \underline{0.0000028 \text{ degrees C.}}$

Surely that impact cannot be *scientifically or factually significant* as required by CEQA Guidelines 15064 (b) so *no action is necessary*. This should also affect the revised SEIR.

The updated draft CAP includes the Schwarzenegger 80% GHG reduction Executive Order which the State Supreme Court has just rejected so it should be revised to remove the 80% reduction in addition to finding County emissions insignificant. And again, the Sierra Club vs. the County Appeals Court decision should be reheard or appealed based on the updated information. No action should be taken on the CAP until this is done.

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