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CLIMATE ACTION PLAN UPDATE PROGRESS REPORT

Overview
On January 13, 2021 (5), the County of San Diego (County) Board of Supervisors (Board) approved new policy guidelines for the Climate Action Plan (CAP) Update to establish actions to meet a net zero greenhouse gas (GHG) emissions reduction goal by 2035-2045. The CAP Update is a mitigation measure for GHG emissions associated with existing and future development anticipated to occur in the unincorporated area as a result of activities associated with the County's 2011 General Plan. The primary objective of the CAP Update is to reduce GHG emissions generated from current and future activities within the unincorporated area of the county and emissions generated by County facilities and operations. Staff's key accomplishments on the CAP Update since the last progress report on April 11, 2022 include refining a draft list of hundreds of actions to reduce GHG emissions that could potentially be incorporated as measures in the updated CAP, initiating a series of five virtual measure development community workshops, presenting the CAP Update at two external stakeholder meetings with the farming community, participating in two Earth Day events, and continuing to implement the 26 GHG reduction measures in the 2018 CAP.

Staff have presented two progress reports to the Board and submitted a progress report memorandum since the CAP Update was initiated in late 2020. On July 14, 2021 (2) and
October 20, 2021 (3), staff presented the approach to developing new CAP measures, engaging diverse stakeholders, and prioritizing equity. The presentations also discussed the preparation of the Supplemental Environmental Impact Report (Supplemental EIR) for the CAP Update, including the court-ordered smart growth alternative. The Supplemental EIR adds to the previous environmental analysis included in the 2011 General Plan Final Program Environmental Impact Report, which did not consider potential impacts on the environment from the new CAP measures. The most recent progress report in April 2022 described the CAP Update's relationship to the Regional Decarbonization Framework and summarized the progress made on the CAP Update and Supplemental EIR since the project was initiated.

This memorandum reports on the CAP Update progress, including alignment of the CAP Update and the Regional Decarbonization Framework, the relationship between the CAP Update and Sustainable Land Use Framework, and how the CAP measure development process is shaped by community feedback emphasizing environmental justice and equity. In addition, the memorandum provides an overview of the 2018 CAP implementation progress.

**2018 CAP Implementation Progress**
The County's existing 2018 CAP includes 26 measures that reduce GHG emissions consistent with the State's 2020 and 2030 GHG reduction goals. These measures continue to be implemented by the County to make progress toward mitigating climate change impacts in our community. The County exceeded the 2018 CAP's 2020 target of 132,205 metric tons of carbon dioxide equivalent (MTCO$_2$e) by implementing measures that supported installation of solar photovoltaics on homes, reduced County fleet emissions, incentivized rain barrel installations through the County Watershed Protection Program, and conserved open space, among others. In 2021, the County reduced 201,932 MTCO$_2$e of GHG emissions, which is equivalent to reducing the emissions from 22,722,178 gallons of gasoline. Overall, the 2018 CAP has reduced 22.5% of GHG emissions needed to achieve the 2030 goal. Implementation highlights and progress for each measure can be found in the recently released 2021 Climate Action Progress Annual Report (Report) at this site: www.sandiegocounty.gov/sustainability/annualmonitoringreport/.

Implementation highlights include continued progress toward increasing the use of renewable energy. The largest GHG emissions reductions in 2021 were achieved through permitting new residential solar photovoltaics (Measure E-2.3), accounting for 16,830 MTCO$_2$e emission reductions. Installing solar photovoltaic panels on homes reduces GHG emissions and makes use of existing built areas to produce renewable energy and reduce electricity costs for residents over time. The County also reduced GHG emissions by producing over 16,700-megawatt hours of electricity with solar photovoltaic installations on County facilities (Measure E-2.4). This amount is equivalent to powering over 2,300 homes for a year.
The County also made progress toward reducing emissions from the transportation sector, the largest source of emissions in the 2018 CAP GHG emissions inventory. County employee commutes were reduced through teleworking by 29%, accounting for 13,554 MTCO2e emission reductions (Measure T-2.3). Additionally, the County fleet reduced emissions by 16% for an additional 4,006 MTCO2e (Measure T-3.4). Progress was also made toward transitioning to a cleaner mobility future. The County continued to operate 45 electric vehicle charging stations for public use, and 84 stations are available for County fleet use at County facilities (Measure T-3.5).

Other efforts to reduce emissions included planting 3,836 trees in County parks (Measure A-2.2) that store carbon as they grow, placing agricultural easements on 395 acres (Measure T-1.2), and conserving 2,185 acres of open space (Measure T-1.1) in 2021.

Upcoming efforts will continue to make progress toward the 2018 CAP 2030 reduction target, including development of updates to the County's Solid Waste Ordinance that will reduce the amount of organic materials that end up in landfills. This Ordinance is part of a broad effort to meet the 80% solid waste diversion goal outlined by the 2018 CAP Measure SW-1.1 and is anticipated to be heard by the Board in August 2022.

The progress made from the 2018 CAP implementation will be informative for the CAP Update measure development process. The CAP Update will consider a wide range of potential actions to reduce GHG emissions, including expansion of measures from the 2018 CAP. The most successful measures will likely be included in the CAP Update and expanded upon as feasible. Other measures from the 2018 CAP may be tailored to improve their performance, combined with new measures, or not included.

As the CAP is updated to incorporate new measures and strengthen existing measures, staff are also considering how to align with and support other climate planning initiatives, including the Regional Decarbonization Framework and the Sustainable Land Use Framework described in the following sections.

CAP Update and the Regional Decarbonization Framework
On January 27, 2021 (3), the Board directed the Chief Administrative Officer to develop the Regional Decarbonization Framework (RDF). The RDF will provide a roadmap to decarbonize the major carbon emitting systems in the region, such as the energy grid, transportation network, and energy use in buildings. The RDF is an integrated Framework that includes a scientifically modeled technical report, a local policy analysis, a workforce development study, and an implementation pathway report. The RDF’s technical report was created in partnership with the University of California San Diego (UC San Diego) School of Global Policy and Strategy and the University of San Diego Energy Policy Initiatives Center (EPIC). The technical report includes strategies and initiatives consistent with state-level pathways to reach zero carbon dioxide emissions in the region by 2045 by developing a systems level approach to reducing emissions at the regional scale. The RDF can help to inform the CAP Update by identifying pathways to
reduce reliance on fossil fuels, facilitate a transition to renewable energy, and preserve and enhance carbon sequestration in natural lands such as oceans, wetlands, and undeveloped lands.

The CAP Update will play an important role in implementing the RDF in the unincorporated area. The CAP team is working to identify CAP Measures that can both reduce GHG emissions and facilitate broader goals of decarbonization in the energy and transportation sectors. Other CAP Measures may align with the RDF Natural Climate Solutions chapter. The chapter describes how natural and working lands can serve as carbon sinks that can help store carbon as part of the overall goal of zero emissions. The 2018 CAP includes a strategy, “Increase Carbon Sequestration”, within the Agriculture and Conservation emissions sector, and the CAP Update will explore ways to continue to build on this strategy by developing new CAP measures.

Based on the RDF’s local policy analysis conducted by the Energy Policy Initiatives Center (EPIC), current CAP commitments for all jurisdictions in the region do not put San Diego County on the path to reach net zero targets by mid-century. EPIC identifies opportunities to build coalitions among the public and private sectors to meet regional emissions goals through collective action. In addition, the analysis concludes that local jurisdictions can do more to reduce GHG emissions. The development of RDF implementation pathways will thus be a collaborative effort between cities, agencies, tribes, business, labor, environmental advocates and communities across the region. The County’s CAP Update will not be the only tool that the County may use to help achieve the goals established by the RDF, but it will be a critical component.

**CAP and the Sustainable Land Use Framework**

With the adoption of SB 743, the State of California changed the method of transportation analysis required through the California Environmental Quality Act (CEQA) for publicly and privately initiated projects. The law changed how local jurisdictions, like the County, analyze transportation impacts from development projects and identify mitigation measures to reduce those impacts. SB 743 became effective on July 1, 2020.

The previous practice of evaluating transportation impacts used road congestion and delay or level of service (LOS). SB 743 requires the amount of driving and length of trips, as measured by "vehicle miles traveled" or VMT, to assess transportation impacts on the environment for CEQA review. These impacts must be reduced or "mitigated" by actions such as increasing transit options, providing active transportation infrastructure such as sidewalks and bike lanes, or including Transportation Demand Management (TDM) programming. TDM is a strategy to reduce vehicle trips and VMT by incorporating measures such as telecommuting, walking, carshare, shuttles, and other options that reduce single occupant vehicle trips. All jurisdictions have the option to tailor requirements to their unique communities.
On February 9, 2022 (7), the Board directed staff to update the County's Transportation Study Guide (TSG) and return to the Board with thresholds for land development projects within the County’s unincorporated communities to meet new CEQA requirements under SB 743. The Board directed staff to establish a new standard for VMT analysis for projects in the unincorporated communities based on the regional VMT average, which includes the entire San Diego County region, including all cities in the region. The Board also provided direction to establish areas in unincorporated communities where project-level VMT analysis and mitigation would not be required because there are not significant impacts.

As part of the Board's direction to update guidelines for VMT analysis, the Board also directed staff to return with options to inform the development of a Sustainable Land Use Framework (SLU Framework). Options would include identifying principles for sustainable development that could inform future land use decisions; and a comparison of planning mechanisms to implement Board directed principles, including zoning overlays, specific plans, community plan updates, or a general plan update. The outcome of the SLU Framework is unknown at this point, but the process may lead to outcomes that result in changes in land use, which may require an update(s) to the General Plan.

The CAP is a tool for mitigating GHG emissions from implementing the 2011 General Plan and associated land use-related activities. If the General Plan were to change as an outcome of the SLU Framework, then the GHG emissions associated with the General Plan could change, and this would be addressed in the next update to the CAP. For example, a potential outcome of the SLU Framework could be changes to the General Plan's land use designations to utilize smart growth principles that concentrate future development into more mixed, compact patterns that creates more housing in areas closer to jobs and transportation options and reduces the distances that unincorporated residents must drive to reach destinations. Another potential result of the SLU Framework could be new programs to further support conservation of natural lands or promote agricultural production economies.

Changes to land uses and transportation options that reduce VMT would result in lower GHG emissions and help achieve CAP objectives. However, because the outcome of the SLU Framework is not yet determined and is progressing on a different timeline than the CAP Update, potential GHG reductions would not be captured in the current CAP Update. Any changes to the General Plan land uses would need to be adopted and any resulting changes to GHG emissions would be reflected in a future update to the CAP. Therefore, it is not anticipated that the SLU Framework will impact the current CAP Update, but it could help achieve future GHG reductions that would be accounted for in a future update to the CAP.

Update on Development of Draft CAP Measures
The CAP project team continues to make progress on developing measures for the CAP Update that align with State GHG emission goals at 2030 and 2045 and the Board's net-zero GHG emissions goal for 2035-2045.

The CAP Update will be a Qualified GHG Reduction Plan for the purposes of tiering under CEQA. Pursuant to CEQA Guidelines Section 15183.5, a Qualified GHG Reduction Plan affords new development the opportunity to use a streamlined GHG emissions analysis under CEQA for projects that are consistent with the County’s 2011 General Plan and that implement all of the required mitigation measures required by the CAP Update. The streamlining benefit is available to new development after the CAP Update is approved and CAP SEIR is certified because the CAP Update provides a programmatic level of GHG mitigation for the entire unincorporated area and planned County facilities. The streamlined analysis results in time and cost savings for new development and reduces legal risk to the County by limiting the environmental analysis needed for individual projects.

For an action in the CAP Update to meet the requirements of a Qualified GHG Reduction Plan, the action must reduce emissions in the GHG emissions inventory, and the reduction must occur within the County's jurisdictional influence (i.e., the unincorporated area and County operations and facilities, regardless of location). The GHG reduction must also be real, permanent, quantifiable, verifiable, enforceable, and additional to any GHG emission reduction otherwise required by law or regulation and any other GHG emission reduction that otherwise would occur.

This spring, the project team evaluated a comprehensive list of actions that may be available for the County to consider as part of the CAP Update. Through this work, the project team evaluated how potential actions could be implemented, how they can support community benefits and equity, if they could help achieve State or County GHG emissions reductions goals, and whether they could meet the requirements to be CAP measures.

Staff have been incorporating research and stakeholder feedback into the list of potential actions to create draft vision statements, strategies, measures, and supporting efforts for each emissions sector. Vision statements will serve as guideposts for the CAP Update by describing a shared goal for the future of the emissions sector. Strategies describe the overall approach to reducing GHG emissions and achieving the vision statements. Measures are specific programs and actions that the County would carry out to achieve its climate action strategies. Finally, supporting efforts are additional actions that may help to reduce GHG emissions or implement measures, but do not meet the requirements of a CAP measure.

An example from the Agriculture and Conservation sector illustrates this hierarchy (note that this example is draft and conceptual):
• **Vision Statement:**
  - Preserve and enhance natural and agricultural lands to capture carbon.

• **Strategy:**
  - Increase carbon sequestration.

• **Measure:**
  - Develop and implement a tree canopy assessment to plant more trees at County properties and in the unincorporated area.

• **Supporting Effort:**
  - Provide education to the public about the benefits of tree planting, including carbon sequestration, drought tolerance, and fire resistance of different tree species.

The project team will collect feedback on the draft vision statements, strategies, measures, and supporting efforts throughout 2022. Starting in June 2022 and continuing into the summer, staff will host public workshops to discuss each of the five emissions sectors in the CAP Update: Solid Waste, Water and Wastewater, Energy, Agriculture and Conservation, and Built Environment and Transportation. The workshops invite participants to provide feedback on draft vision statements for each sector, overall strategies, specific measures, and how the CAP Update can address community benefits and equity through implementation of the plan.

In addition to formal workshops, staff have conducted outreach through several other venues. To provide additional opportunities for stakeholder engagement and feedback, staff maintain a project website, publish a monthly newsletter, post regularly on Facebook and Twitter, and have an open invitation for stakeholders in the unincorporated area to request a presentation on the CAP Update. In May, staff presented to two farmworker community groups and heard comments about how the County can engage with the farming community through the outreach process, learned about some of the issues facing farmworkers such as food insecurity, and heard comments about some stakeholders’ interest in the 2018 CAP measures, particularly the Purchase of Agricultural Conservation Easement (PACE) Program (Measure T-1.2), and how they would like to stay involved in the CAP Update measure development process.

Through a parallel outreach process, staff are conducting internal outreach with County departments that are anticipated to lead implementation of the CAP Update measures. This outreach process is helping staff determine how potential measures would be implemented and how implementation progress would be tracked after the CAP Update is adopted.
At this point in the development of the CAP Update project, all options for reducing GHG emissions are still under consideration. The project team is taking an expansive approach to measure development and is evaluating a variety of policy options to reduce GHG emissions in the community, including through new or revised incentive programs, regulations and education programs. Options for potential measures include carrying forward and expanding measures from the 2018 CAP, such as expanding electric vehicle charging and tree planting, as well as adding new actions such as supporting carbon farming practices. The project team is also evaluating actions to reduce emissions from County operations and facilities by, for example, converting fleet vehicles to zero-emission, using more rooftop solar photovoltaic on buildings, and reducing landscaping and building water use. Quantified draft CAP measures are anticipated to be ready for discussion in early 2023.

Staff will also be seeking feedback on a set of indicators that will help the Board and public compare CAP measures based upon the following subject areas: total GHG emissions reduced, cost per metric ton of GHG emissions reduced, level of community support, equity considerations, and community benefits (e.g., air quality, public health, water conservation, economic growth).

For more information about opportunities to provide feedback on the CAP Update, interested persons are encouraged to visit the project website to subscribe to notifications about upcoming outreach workshops and to see CAP Update project materials, including summaries of public outreach workshops and progress toward implementing the 2018 CAP: https://www.sandiegocounty.gov/content/sdc/sustainability/climateactionplan.html.

If I can be of further assistance, please contact me at (619) 415-9598 or via email at dahvia.lynch@sdcounty.ca.gov.

Respectfully,

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