

Letter  
I80

**From:** ClarkeMH@aol.com  
**To:** CAP  
**Subject:** Comment letter - Climate Action Plan, General Plan Amendment, Draft SEIR  
**Date:** Monday, September 25, 2017 12:36:06 PM

To: Maggie Stoffel, Dept. of Planning and Development Services  
 From: Mary H. Clarke  
 Subject: Comment letter, County Climate Action Plan, General Plan Amendment, Draft SEIR  
 Date: Sept. 25, 2017

Dear Ms. Stoffel:

The County's proposed Climate Action Plan (CAP) needs improvements to meet the State's targets for reducing greenhouse gas emissions (GHGs) which require a 40% reduction below 1990 levels by 2030. The following deficiencies need to be addressed and corrected: I80-1

1. The proposed CAP does not sufficiently address the need to reduce automotive vehicle miles traveled from newly planned housing developments. Leap-frog and sprawl-type developments add to vehicle miles traveled -- a major source of GHGs. New housing developments need to be close to jobs and transit. By allowing developers to purchase "carbon offsets," some of which may even be outside the United States, instead of building housing projects in accordance with "smart growth" principles, the CAP facilitates the very sprawl that helped create the climate crisis in the first place. The CAP must not perpetuate long commutes and increasing traffic congestion. This is a major flaw in the proposed CAP. I80-2

2. Annexations of natural lands in the County by cities that plan to significantly increase the density of development on the annexed lands need to be addressed. I am familiar with two of these proposed annexations, the San Marcos Highlands project (annexation proposed by the City of San Marcos) and the Safari Highlands project, which proposes annexation by the City of Escondido. In both of these cases the land to be annexed is undisturbed valuable habitat and is identified as PAMA in the County's North County Multiple Species Conservation Plan. I80-3

If these lands are annexed, both San Marcos and Escondido plan to increase the development densities significantly, thereby increasing the levels of GHGs well above the open space and rural uses allowed by the County's General Plan. The CAP should seek to work with LAFCO to develop a requirement that annexations should not result in increases in GHGs over the County's land use plan. I80-4

3. General Plan amendments (GPAs) that allow density increases cannot be assumed to have "neutral" impacts on emissions. The proposed approach -- that all current and future GPAs are presumed not to have significant impacts on the CAP because of the DSEIR mitigation measure GHG-1 (GPAs will achieve net zero or obtain offsetting credits) is insufficient to ensure that these GPAs will indeed not increase GHGs. The CAP should disallow GPAs that substantially change land uses and increase densities. I80-5

4. Unlimited out-of-county carbon offsets should not be allowed. A project needs to offset its carbon emissions locally. The caveat that the County will let developers look outside the County for carbon offsets only if allowed by the County, based on a checklist, and only if they have done as much as they can to offset GHGs within the boundaries of the County, allows too many loopholes and is too discretionary. The County's CAP needs to strongly commit to achieving its share of GHG reductions within the County. Development projects need to reduce their own GHG impacts and not rely on carbon credits. I80-6

This concludes my comments on the County's proposed CAP. To truly meet the objectives of GHG reductions, the County needs to close the loopholes discussed above and have a plan that is measurable and enforceable.

Thank you for the opportunity to comment on the proposed CAP and DSEIR.

## Response to Comment Letter I80

**Mary H. Clarke**  
**September 25, 2017**

**I80-1** The comment provides introductory remarks and expresses the opinion of the commenter that the CAP has deficiencies. The comment does not provide an explanation of how the CAP can be improved, therefore no additional response can be provided.

**I80-2** The comment expresses the opinion that the CAP does not address vehicle miles traveled (VMT) from new housing and states that new housing should be located near jobs and transit. However, the CAP is not a land use plan. Land use is regulated through the 2011 GPU. The 2011 GPU, which contains the approved land use map for which the CAP is a mitigation measure, is the approved document which establishes the patterns of development in the County. The County's 2011 GPU focused growth in existing communities by establishing higher densities in villages and planning for diverse uses to create comprehensive live, work, and play communities and a sustainable pattern of development. Therefore, the County has established the regulatory framework to create sustainable patterns of development.

The comment also expresses concern related to the County's policy to allow developers to purchase "carbon offset credits" for use in offsetting emissions related to projects. See Master Response 12 related to mitigation hierarchy and carbon offsets.

**I80-3** The comment expresses concern regarding possible annexations of high-quality habitat and the related impacts to GHG emissions. Please refer to response to comment I72-3 above.

**I80-4** The comment expresses concern that the General Plan Amendments (GPAs) will result in significant GHG emissions and suggests that the CAP should disallow GPAs. See

	<p>response to comment I80-2 above. The CAP is not a land use plan, and GPAs are explicitly allowed by the General Plan when approved by the Board of Supervisors. Also, as the commenter correctly notes, the Draft SEIR adequately discusses the path for GPAs that may result in increased emissions beyond that which the General Plan allocated. See pages 2.7-36 through 2.7-40. Please also refer to Master Response 12 mitigation hierarchy and the use of carbon offsets.</p> <p><b>I80-5</b> The comment expresses concern that the County will allow the unlimited use of carbon offsets from out of the County and suggests that projects should be required to reduce GHG impacts without the use of carbon offsets. Please see response to comments I80-2 and I80-4, and Master Response 12.</p> <p><b>I80-6</b> The comment provides closing comments. No response is required.</p>
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Sincerely,

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