

Response to Comment Letter O10

**Climate Action Campaign
 Sophie Wolfram, Policy Advocate
 Business for Good San Diego
 Karim Bouris, Executive Director
 September 25, 2017**

O10-1: The comment provides an introduction to Climate Action Campaign and Business for Good San Diego. The County appreciates the comments. No further response is required.

From: Sophie Wolfram
To: CAP
Cc: SD Climate Action Warriors; Karim Bouris
Subject: Re: CAC and BFGSD Comments on County of San Diego CAP
Date: Monday, September 25, 2017 4:07:13 PM
Attachments: County_CAP_CAC & BFGSD_Comments.pdf

Dear Ms. Soffel,

Please replace the previous letter with the one attached, which includes CAC's logo.

Thank you,
 Sophie

Sophie Wolfram
 Policy Advocate and Education Coordinator
 Climate Action Campaign
 (914) 715-2451

Follow us on Twitter: @sdclimateaction
Our Mission is Simple: Stop Climate Change

On Mon, Sep 25, 2017 at 3:52 PM, CAP <CAP@sdcounty.ca.gov> wrote:

Thank you for your comments on the Draft Climate Action Plan (CAP) and the Supplemental Environmental Impact Report (SEIR). This comment will be responded to in the Final SEIR.

Thank you again for your input.

Sincerely,

The County's Climate Action Plan Team

From: Sophie Wolfram [mailto:sophie@climateactioncampaign.org]
Sent: Monday, September 25, 2017 3:47 PM
To: CAP <CAP@sdcounty.ca.gov>
Cc: SD Climate Action Warriors <climate-SD@googlegroups.com>; Karim Bouris <karim@sdpartners.org>
Subject: CAC and BFGSD Comments on County of San Diego CAP

Dear Ms. Soffel,

O10-1

Please find attached comments on the County CAP from Climate Action Campaign and Business For Good San Diego.

Best,

Sophie Wolfram

Sophie Wolfram

Policy Advocate and Education Coordinator

Climate Action Campaign

(914) 715-2451

Follow us on Twitter: @sdclimateaction

Our Mission is Simple: Stop Climate Change

C10-1
cont.



Sept. 25, 2017

County of San Diego
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123

Attn: Ms. Maggie Soffel (CAP@sdcounty.ca.gov)

Subject: PDS2015-POD-15-002, PDS2016-GPA-16-007, LOG NO. PDS2016-ER-16-00-003
 (County of San Diego Climate Action Plan)

Dear Ms. Soffel,

Climate Action Campaign (CAC) is committed to stopping climate change by helping local governments in Southern California pass and implement successful climate plans. We envision a future in which all communities should have healthy places to live, work, and play.

Business for Good San Diego is a non-profit organization whose mission is to bring together small business owners to drive policy that improves community. We fundamentally believe that good policy is at intersection of what is good for a business's bottom line, for its employees, and for its community.

Please accept these comments on the County of San Diego Climate Action Plan (CAP).

1. Targets must be based on mass emissions, not per capita emissions, to ensure alignment with state targets.

In order for the county to reach state GHG reduction targets, they must be based on mass emission targets. Per capita targets that are not "capped," are not meaningful as population grows. This is especially true for the County's proposal to use their CAP as a CEQA-qualified plan for new development. Instead, assuming the County reaches equivalency with a 1990 baseline by 2020, the emissions level should then be reduced by 40% by 2020 and by 80% by 2050.

Looking at the math, basing percent reduction targets on population projections for 2030 and 2050 yields less ambitious targets than simply using mass emissions and ensuring alignment with state targets. Given a 2014 baseline of 3,211,515 and a 2020 level of 3,147,285 (based on the 2% reduction target for 2020), a 40% reduction from that 2020 level would yield a 2030 emissions level of 1,888,371 and a 2050 level of 629,457. The 2030 target, in this case, would be 2% lower than in the Draft CAP, and the 2050 target would be 15% lower. These calculations show that there are significant differences between the County targets and targets that would be in line with goals established in SB 32 and EO-S-05.

O10-1
cont.

O10-2

O10-3

O10-2: The comment states that the CAP GHG emission reduction targets should be based on mass emissions, not per capita emissions, to ensure alignment with state targets. Please refer to Master Response 4 on GHG reduction targets.

O10-3: The comment states that the CAP GHG emission reduction targets based on per capita emissions yields a less ambitious target than using a mass emissions target. Please refer to Master Response 4 on GHG reduction targets.



2. The Direct Investment Strategy needs additional clarification and is not an acceptable replacement for direct emissions reductions from land use and transportation.

The Direct Investment Program accounts for 190,262 of 229,482 metric tons, or 83%, of reductions in the Built Environment and Transportation category. It also accounts for 21% of total annual emissions reductions (Appendix C, Table 5). This is a substantial share of the emissions reductions from the CAP; accordingly, a high degree of clarity and evidence about how the measure will reduce emissions in the county is necessary.

This strategy is untested and raises several concerns. First, the CAP lacks adequate detail describing how a direct investment program would work, what level of experience the staff running the program have, and, most importantly, demonstrating that this program would work using the "substantial evidence" test under CEQA. County staff provided examples at the informational presentation on September 19, 2017, of types of projects the County might focus on for direct investment. In addition, Appendix B lists a range of protocols that may be applied to County direct investment projects. Examples provided included weatherization of existing structures, urban tree planting, carbon farming, and methane recapture for dairy and from landfills. These are worthy ventures; however, the question remains, where is the substantial evidence that these projects, cumulatively, can provide the emissions reductions projected for this strategy? Attachment 1 of Appendix C, which shows the calculations and assumptions supporting GHG reduction estimates for each measure, omits measure T-4.1. The County must demonstrate substantial evidence that this strategy is feasible and, if implemented, would lead to the emissions reductions identified.

As importantly, how do direct investments benefit the communities where pollution from transportation is generated? What are the public health impacts the lack of investment in public infrastructure for walking and biking? Similarly, we are concerned about the air quality impacts of having direct emissions reductions from transportation and land use count for just 4.4% of total reductions.

We recommend that the Direct Investment strategy be unbundled from the Built Environment and Transportation section of the CAP. Implementation of the Direct Investment strategy will not primarily reduce emissions from Built Environment and Transportation, so it should not be listed under that umbrella. Further, lumping measure T-4.1 into the Built Environment and Transportation strategy creates the misleading impression that the reductions from that category are greater than they are in reality.

O10-4

O10-5

O10-6

O10-4: The comment states that the CAP does not describe how the local direct investment program (GHG Reduction Measure T-4.1) will work and whether it would achieve the projected GHG emissions reductions. The comment also states that GHG Reduction Measure T-4.1 is not an acceptable replacement for direct emissions reduction from land use and transportation. Lastly, it states that the County must demonstrate substantial evidence that this strategy is feasible and, if implemented, would lead to the emissions reductions identified. The County has provided substantial evidence at the program level that GHG Reduction Measure T-4.1 would reduce emissions in the unincorporated County through local direct investments. Page 2.7-25 and Appendix B of the CAP SEIR provides substantial detail on the numerous local direct investment options for the County to undertake. The Draft SEIR evaluates the impacts of GHG Reduction Measure T-4.1 throughout the document. Regarding the adequacy of the protocols and methodology that ensure the environmental integrity of the local direct investments and how the local direct investment projects would be tracked and enforced, please see response to comment O14-13 and Master Response 3 related to the local direct investment program. GHG Reduction Measure T-4.1 requires the County PDS to establish a local direct investment program by 2020. However, the County PDS has begun work on the local direct investment program now to provide the decision makers with an estimate on costs associated with implementation of GHG Reduction Measure T-4.1. The Preliminary Assessment of the County of San Diego Local Direct Investment Program is provided as an attachment to the Planning Commission Hearing Report. It should also be noted that the commenter does not provide any substantial evidence that GHG Reduction Measure T-4.1 would not be effective.

The CAP and Draft SEIR provide a good-faith, programmatic evaluation of the direct investment projects and evaluates their physical environmental impacts. The local direct investment program, when considered for adoption in 2020, would be required to undergo project-specific analysis for the projects the County would focus on to reduce emissions by 2030.

Please see Master Response 9 regarding the use of a program EIR evaluation of CAP measures, and streamlining under CEQA.

The local direct investment program would be run by PDS staff in coordination and partnership with other County experts (e.g., County Parks and Recreation staff experienced with tree planting for the urban tree planting project option and County PDS Building Division engineers with the weatherization of existing structures option). County PDS staff are also experts in planning and environmental planning with expertise in all phases of project management. Several PDS staff are American Institute of Certified Planners (AICP-certified) planners. As indicated on page 3-39 of the CAP, PDS and SDAPCD are responsible for implementation of GHG Reduction Measure T-4.1. It should also be noted that the commenter does not provide any list of qualifications that would suggest that implementation of GHG Reduction Measure T-4.1 cannot be implemented by County experts. See Master Response 3 related to direct investments for additional information regarding the program.

O10-5: The comment questions how the local direct investment program (GHG Reduction Measure T-4.1) would benefit communities where pollution from transportation is generated and expresses concern that GHG reductions from transportation and land use only account for 4.4% of total GHG reduction. GHG Reduction Measure T-4.1 is one component of the CAP that would be used in addition to investments in infrastructure improvements throughout the County. The local direct investment program would be implemented throughout the unincorporated County, where the benefits of carbon sequestration and GHG emissions reductions would occur. The program would be used as an adaptive management tool to reduce GHG emissions and meet the 2030 target.

The County recognizes the importance of protecting residents from poor air quality. As described in Chapter 2.3 of the Draft SEIR, it is possible that implementation of the CAP would result in significant and unavoidable air quality impacts related to exceedance of air quality standards, criteria pollutants,

sensitive receptors, and odors; however, these impacts are all short-term and related to construction activities associated with specific reduction measures. In general, implementation of the CAP would result in overall improvements to air quality county-wide because of using cleaner fuels in vehicles and renewable energy production.

The County also recognizes the value of investing in alternative transportation and land use strategies and as described on pages 1-10 and 1-11, the CAP includes GHG Reduction Measures that foster the use of transportation demand management strategies, improve park-and-ride facilities to link residents to the regional transit network, and improve bicycle and pedestrian infrastructure. Additionally, the CAP helps to implement the villages planning structure which was introduced in the 2011 GPU, by emphasizing the development of complete communities and reducing VMT through provision of services and jobs closer to people's homes. In response to similar comments, the County has included Measure T-3.5 to increase the uptake of electric vehicles (EVs) throughout the unincorporated County. Therefore, the County believes it has appropriately emphasized a balanced approach to the built environment sector.

O10-6: The comment states the local direct investment program should be unbundled from the Built Environment and Transportation section of the CAP. The placement of this strategy does not alter the amount of reductions associated with it, and it is most generally related to activities affecting this sector (e.g., weatherization). The County acknowledges this comment. However, the comment does not address the adequacy of the Draft SEIR. Therefore, no further response is required or necessary.



3. The Draft CAP Lacks Adequate Commitment to Emissions Reductions From Built Environment and Transportation Strategies.

Although 45% of the County's emissions currently come from on-road transportation, just 4.4% of total reductions will result directly from built environment and transportation strategies.¹ This egregious gap between the sources of emissions and the solutions advanced raises the question of whether the County CAP is consistent with and supports the intent of SB 375, which integrates transportation, land use, and housing policies to reduce emissions from passenger vehicles.

O10-7

Further, this disproportionate lack of investment in land use and transportation strategies to reduce emissions will likely have significant public health impacts from continued emissions from vehicles and from a lack of safe and efficient active transportation options.

O10-8

Built environment and transportation targets should include aggressive mode share targets for walking, biking, and mass transit. Measures to reach targets should include the development of extensive pedestrian networks and protected, connected bike lanes, as well as concentration of development around existing transit routes.

O10-9

4. Community Plan Update Strategy Needs Clarification

Strategy T-1.3 indicates intent to update 10 community plans by 2030 and 9 more between 2031 and 2040, which will "achieve mixed-use and transit-oriented development within existing village centers." Appendix C shows that this measure projects a 12% VMT reduction in the population affected by the Community Plan Updates. It assumes that by 2030, half of the Community Plan Updates will be implemented.

O10-10

The measure, and the assumptions used to calculate reductions from it in Appendix C, need to provide more description of the set of strategies that will be required of Community Plan Updates to ensure that the reductions in VMT are achieved.

5. Recommend Increasing to 90% Zero Emissions Vehicles in County Fleet by 2030.

The performance metric for T-3.4 is to reduce County fleet emissions by 20% by 2030; we recommend aggressively pursuing the transition to zero emissions vehicles in the county fleet when updating the Strategic Energy Plan and the Green Fleet Action Plan.

O10-11

¹ When the emissions reductions from the direct investment measure are subtracted out of the reductions projected from measures related to built environment and transportation (229,482-190,262=39,220), we see that just 39,220 MT CO₂e out of 879,145 MT CO₂e of reductions in 2030 are projected to come from strategies within built environment and transportation.

O10-7: The comment expresses concern that the CAP is inconsistent with SB 375. The County disagrees. Please refer to Master Response 2 regarding the CAP and consistency with SB 375. The comment also expresses concern that only 4.4% of the total reductions will result from built environment and transportation strategies and attempts to correlate this total percentage to the CAP's consistency with SB 375. This is incorrect. As detailed within Master Response 2, the Draft CAP does not propose any changes to land use. Therefore, it is inherently consistent with the VMT projections in the Regional Plan, which in turn is consistent with SB 375.

O10-8: The comment states that the lack of investment in land use and transportation strategies to reduce emissions could result in significant public health impacts. Please refer to response to comment O10-5. The 2011 GPU PEIR evaluated the environmental impacts related to adopted land use and transportation policies contained within the 2011 GPU in Chapters 2.9 Land Use and 2.15 Transportation and Traffic. Please refer to that document for more information regarding vehicle emissions. The comment offers no evidence to support this assertion. Therefore, no further response can be provided or is necessary.

O10-9: The comment states the CAP should include mode share targets for walking, biking, and mass transit. Please see Master Response 6 on transportation GHG reduction measures and Master Response 9 related to the measure selection process. In response to similar comments, the County has included GHG Reduction Measure T-3.5 to increase the uptake of EVs throughout the unincorporated County. Supporting efforts also include facilitating the growth of EV charging infrastructure. GHG Reduction Measure T-2.1 seeks to improve roadway segments for expansion of multi-modal options and GHG Reduction Measure T-2.2 would require Transportation Demand Management (TDM) strategies in non-residential development. Regarding more aggressive mode share targets for mass transit, the unincorporated County does not have jurisdiction over increased mass transit infrastructure. Mass transit infrastructure (e.g., extension of bus routes) are under

the jurisdiction of MTS and NCTD and coordinated regionally by SANDAG. Additionally, construction of new transit infrastructure (e.g., rail) would have economic and technological constraints, would not be consistent with the rural character of much of the County, and may not be able to be implemented at the scale that would be required to reach GHG reduction targets by 2030. While outside of the County's jurisdiction to provide mass transit opportunities, the CAP does provide supporting efforts. GHG Reduction Measure T-1.3 requires the County to collaborate with the SANDAG, MTS, and NCTD to explore expansion of transit service to the unincorporated areas; and to collaborate with incorporated cities, Caltrans, and SANDAG to consider additional park-and-ride facilities.

O10-10: The comment states that GHG Reduction Measure T-1.3 should include more detail regarding the types of strategies that would be employed to ensure that VMT reductions are achieved. 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. The County's focus would be on communities that support diverse uses and transit opportunities. 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. Refer to Master Response 5 related to community plan updates. The comment does not address the adequacy of the SEIR; therefore, no further response is required or necessary.

O10-11: The comment recommends that the County push transition to zero emissions vehicles in the county fleet when updating the Strategic Energy Plan and the Green Fleet Action Plan. The County acknowledges this comment. The comment does not address the adequacy of the Draft SEIR. No further response is required. Please refer to Master Response 9 on selection of GHG reduction measures in the CAP.



7. Recommend 100% Clean Energy Target with Community Choice Energy

Measure E-2.1 sets a 90% renewable electricity target for 2030. We recommend instead a 100% clean energy goal, which would make the County consistent with the city of San Diego and other cities moving toward 100%, including Del Mar, Solana Beach and soon, Encinitas.

By embracing a 100% clean energy future, all families will benefit from a greener grid because renewable energy helps clean the air, builds healthy communities, and spurs local investment and well-paying jobs from clean energy technologies. In addition, adding a 100% clean energy goal in the county would signal a region-wide commitment to the shift to renewables. It is increasingly clear that 100% clean energy is the future in California and across the nation: the County CAP should reflect a commitment to keep pace with the region and the state.

We recommend using Community Choice Energy as the key strategy to achieve 100% clean energy. Community Choice is a tried and true program allowing families throughout California to purchase cleaner, cheaper energy and enabling local governments to reinvest revenues back into the community. Every operational CCE program is successfully mitigating risk and generating significant benefits for ratepayers. The County should move swiftly to complete a Technical Feasibility Study for Community Choice Energy.

Further, it is unclear why this is marked as a high-cost measure. What are the short-term or long-term costs that individuals or private businesses would incur?

8. Recommend 90% Solid Waste Diversion Target by 2030

As the CAP notes, emissions from solid waste and existing landfills are a significant component (11%) of the total GHG emissions. It isn't clear why the CAP proposes no emission reductions by 2020 and why the County cannot begin to increase its waste diversion activities before 2020. We recommend that the CAP adopt a more aggressive but feasible target of 90% diversion by 2030, which is similar to the City of San Diego CAP target of 90% by 2035.

9. Recommend Inclusion of an Environmental Justice/Social Equity Section

While climate change impacts everyone, it hits hardest in low-income and communities of color that face a disproportionate pollution burden. The State of California has recognized the challenges facing Environmental Justice communities and prioritized those areas for allocation of Cap and Trade funds. San Diego is the first city in California to adopt a CAP that utilizes a statewide monitoring tool called CalEnviroScreen, which identifies vulnerable communities and can be used to direct investment and benefits to these neighborhoods.

O10-12

O10-13

O10-14

O10-15

O10-16

O10-12: The comment suggests that the County should adopt a 100% renewable energy target by 2030. The County evaluated the 100% Renewable Energy Alternative as part of its alternatives analysis on pages 4-19 through 4-23 of the Draft SEIR. Ultimately, adoption of a 100% renewable energy target and a Community Choice Energy (CCE) program, or another program as required through the Renewable Energy Program in GHG Reduction Measure E-2.1 is a decision for the Board of Supervisors. This comment does not address the adequacy of the Draft SEIR. This comment is noted and will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project.

O10-13: This comment suggests that the County should establish a CCE program and should complete a feasibility study in the near term. Please refer to response to comment O10-12. The comment does not address the adequacy of the Draft SEIR. The comment also does not provide evidence to support that every operational CCE program is successful. The Board of Supervisors will establish a Renewable Energy Program to achieve the reductions needed from GHG Reduction Measure E-2.1. This comment is noted and will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project.

O10-14: The comment questions why GHG Reduction Measure E-2.1 is identified as a high-cost measure. The County has prepared a cost-benefit analysis of all the GHG Reduction measures in the CAP to give the decision makers the total costs to implement the CAP. A report has been prepared that describes a preliminary estimate of costs and benefits related to the implementation of the CAP. The Climate Action Plan Implementation Cost Report: A Preliminary Estimate of County of San Diego Costs for the Five-Year Forecast is provided as an attachment to the Planning Commission Hearing Report. Information related to the costs to implement GHG Reduction Measure E-2.1 is included in the first report. A summary of the results of the report is provided below.

The County initiated a Climate Action Plan Implementation Cost Report (Report), which indicates a total \$236.4 million to

implement the Final CAP in the first six years. Ninety percent of the costs (\$212.1 million) are existing, funded activities and programs that the County is leveraging to achieve GHG reductions and that would be undertaken with or without a CAP. The new and expanded activities and programs, estimated at \$24.3 million, are 10% of the total cost to implement the draft Final CAP in the first six years. Key findings from the analysis include:

- a. Total implementation costs are steady over the six-year period;
- b. Existing programs account for a significant portion of implementation costs;
- c. Incremental implementation costs are comparatively low;
- d. A limited number of incremental programs are unfunded; and
- e. Current staffing levels are sufficient to cover most of the implementation activities.

The County's consultant, the Energy Policy Initiatives Center (EPIC), developed the Report, which estimates the County costs over a six-year period from FY 2017-18 through FY 2022-23, and identifies the potential budget impacts in the first years of CAP implementation. The costs will be reflected in the County's Operational Plan for FY 2018-19 and FY 2019-20. Through implementation and monitoring, including the five-year CAP updates and annual progress reporting, the County will track implementation efforts and reassess costs to synchronize with the budget process. The County will also leverage financing sources by monitoring funding opportunities and mechanisms.

O10-15: The comment recommends that County pursue a 90% waste diversion rate by 2030. The County acknowledges this comment. The County would also like to note that current waste prevention and reuse efforts as well as hauler diversion programs have resulted in a diversion rate of approximately 62% (2015), as noted in the County's recently released report *County of San Diego Strategic Plan to Reduce Waste*. Therefore, the County disagrees with the assertion that efforts

are on hold prior to 2020. The comment does not address the adequacy of the Draft SEIR. The comment is noted and will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project. Please see Response to Comment O1-34 and Master Response 9.

O10-16: This comment suggests that the County should include an Environmental Justice section to prioritize energy efficiency and renewable energy upgrades in communities that may be disproportionately affected by the effects of climate change. The County agrees that this topic is important and will address it more comprehensively in future planning efforts including General Plan Updates and Community Plan Updates as required by SB 1000. As part of updates required through SB 1000 the County will use CalEnviroScreen and other methods to locate and address issues within Environmental Justice communities. This comment does not address the adequacy of the Draft SEIR. However, this comment is noted and will be included as part of the Final EIR and made available to decision makers prior to a final decision on the project.



We recommend that the County CAP include an Environmental Justice section that utilizes CalEnviroScreen to prioritize populations hit first and worst by climate change. Programs in EJ communities might include ensuring all populations in the County have access to solar energy, home energy efficiency upgrades, and green spaces. Lastly, the city should address how CAP strategies can create good-paying jobs for residents and improve quality of life in communities throughout the County.

O10-16
cont.

10. Recommend Inclusion of Detailed Timeline and Cost Analysis for Each Strategy

We are pleased with the first iteration of the Draft CAP's implementation and monitoring plan; however, we recommend including a more detailed timeline with a system to prioritize implementation of each strategy, as well as a cost analysis for for each strategy. This level of detail is critical for public accountability of the CAP's success and will ensure the County sets sufficient budgeting and staffing levels at the appropriate time.

O10-17

Finally, we are pleased that the County will conduct annual monitoring reports, perform GHG inventory updates every two years, and prepare CAP updates every five years. We agree that the CAP is a living document and note that the five-year update schedule should not preclude mid-course adjustments if new opportunities arise to further reduce emissions.

O10-18

Conclusion

In this modern era of climate action planning, local governments across the region are moving aggressively toward 100% Clean Energy, CCA, significant commuter mode shift goals, and environmental justice. We hope to see the County of San Diego emerge as a regional climate leader and strongly urge you to incorporate the recommendations enumerated above.

O10-19

Thank you for the opportunity to weigh in on this critically important planning document.

Sincerely,

Sophie Wolfram
Policy Advocate
Climate Action Campaign

Karim Bouris
Executive Director
Business For Good San Diego

O10-17: This comment recommends that the CAP include more detail regarding the cost and timing of measure implementation. As described in Table 5.1 of the CAP (see pages 5-10 through 5-15), the County has identified implementation timelines and general cost for each measure. The County has prepared a cost-benefit analysis for the measures which will provide additional information for the Board of Supervisors to determine the costs and benefits of each measure.

O10-18: This comment expresses support for the annual monitoring reports, GHG inventory updates, and CAP updates. The County appreciates the support. This comment does not address the adequacy of the Draft SEIR and no further response is required.

O10-19: The comment provides concluding remarks. No further response is required.