

Letter
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From: Sarah Benson
To: CAP
Cc: Bob Leiter; Laura Schumacher
Subject: Comments on CLIMATE ACTION PLAN (PDS2015-POD-15-002), GENERAL PLAN AMENDMENT (PDS2016-GPA-16-007), DRAFT SEIR (LOG NO. PDS2016-ER-16-00-003)
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 SC4G - Comments on SD County CAP 9-25-17.pdf

September 25, 2017

TO:
 County of San Diego
 Planning and Development Services Department
 Attn: Maggie Soffel
CAP@sdcounty.ca.gov

Attached: STAY COOL Comments on CLIMATE ACTION PLAN (PDS2015-POD-15-002), GENERAL PLAN AMENDMENT (PDS2016-GPA-16-007), DRAFT SEIR (LOG NO. PDS2016-ER-16-00-003)

Dear Ms. Soffel:

STAY COOL for Grandkids (SC4G) has attached here a letter containing comments on the draft County of San Diego Climate Action Plan (CAP), General Plan Amendment (GPA), and Draft Supplemental Environmental Impact Report (DSEIR). Thank you for your consideration.

Please feel free to contact STAY COOL Advisory Council members Bob Leiter at rleiter9@cox.net or Laura Schumacher at lauras@san.rr.com if you have specific questions regarding the comments contained in this letter.

Sincerely,

Sarah Benson
STAY COOL for Grandkids (SC4G)
 Administrative Director
 760-809-7958
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O23-1

Response to Comment Letter O23

STAY COOL for Grandkids
Sarah Benson
September 25, 2017

O23-1 This comment provides introductory remarks. No further response is required.



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County of San Diego
 Planning and Development Services Department
 Attn: Maggie Soffel
 5510 Overland Avenue, Suite 310
 San Diego, CA 92123
CAP@sdcounty.ca.gov

Subject: Comments on CLIMATE ACTION PLAN (PDS2015-POD-15-002), GENERAL PLAN AMENDMENT (PDS2016-GPA-16-007), DRAFT SEIR (LOG NO. PDS2016-ER-16-00-003)

Dear Ms. Soffel:

STAY COOL for Grandkids (SC4G) appreciates the opportunity to provide comments on the draft County of San Diego Climate Action Plan (CAP), General Plan Amendment (GPA), and Draft Supplemental Environmental Impact Report (DSEIR), which were circulated for public review on August 10, 2017. *SC4G* is a membership organization of grandparents, elders and other citizens in the San Diego region dedicated to preserving a livable climate in the name of those too young to have voice: our future generations. Along with other partner organizations in our region, we advocate for meaningful action on climate change and support policies that will have a lasting effect by reducing emissions and securing our quality of life.

O23-2

The *Notice of Availability* for the draft County of San Diego Climate Action Plan, General Plan Amendment, and Draft Supplemental Environmental Impact Report states that "the purpose of the project is to reduce county GHG emissions consistent with State legislative requirements through implementation of the CAP, which includes strategies and measures to reduce GHG emissions from community and County operations. Community operations refer to GHG emissions generated from activities within the unincorporated county. County operations refer to GHG emissions generated by County facilities and operational activities throughout the county, including facilities and operations located within incorporated cities." Overall, we strongly support the County of San Diego's intent to adopt a new CAP and supporting documents that meet these stated purposes. We feel that the draft CAP and supporting documents provide a thorough explanation of the required contents of a climate action plan, along with a good overview of many of the key factors that need to be considered in formulating the proposed plan. We also feel that many of the proposed strategies and measures that are identified in the draft CAP will be effective in reducing GHG emissions in the unincorporated areas within San Diego County, as well as reducing GHG emissions associated with County operations. In addition, we commend the County staff and its consultants for reaching this major milestone in a timely manner.

O23-3

GENERAL COMMENTS

Overall, we believe that the draft Climate Action Plan and its supporting documents reflect a significant effort to move the County of San Diego in a positive direction, both from a community and an operational perspective.

O23-4

- O23-2** This comment provides background information regarding Stay Cool for Grandkids. The County appreciates the comments.
- O23-3** This comment expresses support for the CAP and agreement that many of the proposed strategies and measures will be effective in reducing GHG emissions in the unincorporated area. The County appreciates the support. The comment will be included in the Final EIR and made available for decision makers prior to a final decision on the project.
- O23-4** This comment provides an introduction to comments previously raised on the Notice of Preparation (NOP) that will follow in the body of the letter. Those comments are addressed below. No further response is required or necessary.

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However, we do not feel that the draft CAP documents and the DSEIR respond adequately to **four key areas of concern** that SC4G raised in its previous letter on the *Notice of Preparation (NOP)* documentation for this project (see Attachment 1).

1. Concern:

The Project Description in the NOP does not provide adequate information about the proposed CAP itself, including the methodology for establishing the baseline emissions inventory, the methodology for setting GHG emission targets in the CAP, and the range of possible measures that will be considered for inclusion in the CAP. This makes it extremely difficult to comment on the specific environmental issues that should be covered in the EIR.

Comment:

While we feel that the draft CAP and DSEIR provide a good overall explanation of the methodology for establishing the baseline emissions inventory and the method for setting the overall GHG emission targets in the CAP, we do not believe that the CAP documents adequately identify the range of possible reduction measures that were considered for inclusion in the CAP, and the criteria that were used to select the specific measures that were included in the draft CAP, as well as the reasons for not including other measures that could be effective in helping the County to meet its GHG emission targets.

The Executive Summary (p. ES-1) states that “the County of San Diego’s (County’s) CAP is a multi-objective plan that balances environmental, economic, and community interests; implements the County’s General Plan; and aligns with multiple County initiatives. It identifies strategies and measures to meet the State’s 2020 and 2030 greenhouse gas (GHG) reductions targets, and to demonstrate progress towards the 2050 GHG reduction goal.” However, we did not find a clear delineation in the draft CAP of the range of possible GHG reduction measures that were considered in formulating the plan, nor any indication of the specific criteria that were used in selecting the specific measures that are included in the CAP. While the document refers to “co-benefits” and “relative costs” as factors for consideration (pp. 3-5 to 3-7), it does not clearly define these factors or explain how they were used in the evaluation of possible GHG reduction measures.

In particular, we are concerned that while the GHG emissions inventory and analysis in the draft CAP point out that the largest single source of GHG emissions in the unincorporated area is from on-road transportation (primarily cars and light trucks), the proposed reduction measures in the draft CAP are heavily weighted toward greater use of renewable electricity, along with unspecified reduction measures associated with a proposed “Direct Investment Program.” We believe it is incumbent upon the County to use its land use authority to help put in place sustainable patterns of development, along with necessary transportation facilities and programs, in order to reduce overall vehicle miles traveled (VMT) and associated GHG emissions over time. This is particularly important in the unincorporated areas, which currently generate some of the highest VMT per capita rates in the region.

2. Concern:

The NOP does not adequately explain how previously initiated requests for County General Plan Amendments, such as the “Property Specific Requests General Plan Amendment” (<http://www.sandiegocounty.gov/content/sdc/pds/advance/PSR.html>), will be considered in the new CAP and the associated EIR. We believe that the new CAP should focus on ways to meet the GHG reduction targets in conjunction with the implementation of the already adopted 2011 County General Plan, and that the EIR should evaluate the environmental impacts of implementing the adopted County

O23-4
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O23-5

O23-6

O23-7

O23-8

O23-5

This comment expresses concern that the Project Description in the NOP did not provide adequate information about the CAP, including the methodology for establishing the baseline emissions inventory, the methodology for setting GHG reduction targets, or the range of measures that were considered. The commenter expands on this concern in comment O23-6, which is addressed below. The Project Description included in the Draft SEIR, and the contents of the CAP have been substantially expanded since the time of the NOP release, but within the overall framework of modeling methodology, approach, and scope described for the CAP in the NOP. CEQA Guidelines Section 15082 (a)(1) states that lead agencies in issuing the NOP must provide “sufficient information describing the project and the potential environmental effects to...make a meaningful response.” The County provided a sufficiently detailed project description in the NOP, consistent with this requirement. Further, the commenter, has had an opportunity to review the more detail project description and supporting analysis for the CEQA-mandated 45-day review period. The comment does not address the adequacy of the Draft SEIR, therefore, no further response can be provided.

O23-6

This comment expresses concern that the CAP documents do not provide enough detail regarding how GHG Reduction Measures were selected for inclusion. The scope of the CAP is to serve as mitigation to reduce GHG emissions resulting from buildout of the 2011 GPU in accordance with GPU Policy COS-20.1 and GPU EIR Mitigation Measure CC-1.2. The range of measures included in the CAP were determined through review of potential available strategies and measures, their effectiveness in reducing GHG emissions, and their applicability to the unincorporated areas. The final strategies and measures for inclusion in the CAP were determined through visioning sessions, workshops, and meetings with stakeholder groups and deliberation among the County’s Sustainability Task Force members, comprised of 11 County departments. As described on pages 6-2 and 6-3 of the CAP, the County collaborated with over 50 stakeholder groups in the

environmental, business, and community sectors during a total of over 100 public events to gather input to inform development of strategies and measures for the CAP. The primary determinant for whether a measure was chosen was its GHG reduction potential and whether it would help the County achieve its GHG reduction target in 2030. Measures were also assessed for their applicability and effectiveness in the County's unique rural setting. The County focused on measures that would be enforceable, achievable, and measurable. The County is also committing to a robust monitoring program to ensure that the CAP stays on track and can be adaptively managed, as necessary. Potential co-benefits of reduction measures and their relative cost were secondary determinants for measures chosen. Co-benefits represent beneficial secondary effects that may result from implementing strategies and measures. These co-benefits could include air-quality improvements, conservation of biological resources, carbon sequestration, community health, cost savings, energy savings, improved mobility, job generation, noise reduction, public health improvements, water quality improvements, and water savings. Co-benefits are not necessary for measure selection, but identify important beneficial aspects of a measure. Relative costs are used as a feasibility metric for County deliberation. The County also prepared detailed implementation cost analyses for the CAP which are included as attachments to the Planning Commission Hearing Report. The Climate Action Plan Implementation Cost Report: A Preliminary Estimate of County of San Diego Costs for the Five-Year Forecast includes an estimate of internal costs to the County of San Diego for implementing and administering the CAP and its GHG reduction measures. The Climate Action Plan Cost-Effectiveness Analysis includes an estimate of the net benefits or costs to residents, businesses, and County operations that participate in, or comply with, the GHG reduction measures. These analyses will be provided as information for the decision-makers; however, they will not be the primary determinants on selected measures.

	<p>The CAP includes 30 GHG reduction measures all of which combine to meet the legislatively-required reductions by 2030. The County could consider additional measures or varying degrees of implementation of each GHG reduction measure, to the degree implementation would be feasible to reach its ultimate 2030 target. However, the CAP that is proposed and evaluated throughout this Draft SEIR has recommended the full spectrum of feasible GHG reduction measures, including a new measure (T-3.5) and increases in reductions from other measures, at the levels that reductions can be feasibly attained and estimated. See also Master Response 9 related to the selection of GHG Reduction Measures.</p> <p>O23-7 This comment expresses concern that the GHG Reduction Measures in the CAP are disproportionately weighted to the use of renewable energy rather than curbing emissions related to the transportation sector. Please refer to Master Response 6 related to transportation GHG reduction measures.</p> <p>O23-8 This comment expresses concern that General Plan Amendments (GPAs) would be covered by the CAP and Draft SEIR. As described on page 2-14 of the CAP, GPAs are not considered in the CAP emissions inventory baseline, and are required to mitigate incremental emissions beyond the 2011 GPU land use designation in accordance with CAP Mitigation Measure M-GHG-1 of the Draft SEIR. All GPAs will continue to be subject to discretionary review and must be considered by the Board of Supervisors as discrete actions. The Draft SEIR adequately evaluates cumulative impacts throughout. See for example, cumulative impact analysis of the Draft SEIR, Chapter 2.7. The CAP provides CEQA streamlining pursuant to 15183.5 only for the land uses and associated density that are consistent with the adopted 2011 GPU land use plan. See Master Response 10 related to the use of Program EIR in evaluating CAP measures and streamlining.</p>
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General Plan and associated draft CAP. Any proposed amendments to the 2011 County General Plan should be evaluated separately.

Comment:

We are still not clear from reviewing the draft CAP documents and DSEIR how the County will specifically be addressing the environmental impacts of projects that include amendments to the County General Plan, and whether such projects would be able to move forward without further environmental analysis of climate change-related impacts and proposed mitigation measures. We would request that the final CAP documents and EIR provide a clearer explanation of how this would work.

O23-8
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3. Concern:

The CAP and the associated EIR should address not only the direct responsibilities of the County of San Diego to reduce GHG emissions as its General Plan is implemented in the unincorporated areas of the County, but should also address how the new CAP will assist the overall San Diego region in meeting its SB 375 GHG reduction targets. Specifically, it is our understanding that SANDAG used the adopted 2011 County General Plan land use designations and associated population, housing and jobs forecasts in performing the GHG reduction analysis for its Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS).

Comment:

We are still not clear from reviewing the draft CAP documents how the County is differentiating the GHG reductions that will be obtained as a result of its proposed "Built Environment and Transportation" GHG reduction measures from those transportation and land use planning factors that have already been assumed for the unincorporated portion of the County in the growth forecasts that were used by SANDAG in conducting its regional GHG reduction analysis for the RTP/SCS. It is important to ensure that the County and SANDAG are taking a coordinated approach to helping the region meet its SB 375 GHG reduction targets, and that the County's proposed reduction measures are not simply a duplication of land use and transportation factors that are already assumed in the RTP/SCS. We would request that the final CAP documents and EIR specifically address this concern.

O23-9

4. Concern:

We understand further that SANDAG's GHG reduction analysis demonstrated that the region could meet the GHG reduction targets established for it by the California Air Resources Board (CARB) pursuant to SB 375, and that SANDAG's findings regarding compliance with the SB 375 targets were later reviewed and accepted by CARB. Therefore, in formulating the new County CAP and evaluating it in the EIR, it should be recognized that any future changes to the County General Plan that would lead to greater GHG emissions from new development would need to be evaluated not only in terms of how they would affect the County's ability to meet its new CAP targets, but also how they would affect the ability of the San Diego region to meet its SB 375 mandated targets.

Comment:

We are not clear from our review of the draft CAP documents how the County will ensure that any future County General Plan amendments will not inadvertently conflict with land use and transportation factors and/or assumptions for the unincorporated area that were used as the basis for SANDAG's regional GHG reduction analysis. We would request that the final CAP documents and EIR specifically address this concern.

O23-10

O23-9 This comment requests that clarification be provided regarding how the County is differentiating the GHG reductions in the CAP from those already assumed in the growth forecasts used by SANDAG for the RTP/SCS. The comment also asks whether the CAP is consistent both with SB 375 and San Diego Forward: The Regional Plan. VMT projections provided by SANDAG incorporate the County's land use forecasts and account for achievement of regional SB 375 targets as accepted by CARB. Thus, the CAP's forecasted VMT, which was provided by SANDAG after the adoption of the San Diego Forward: The Regional Plan, and related emissions forecasts through 2050 in the CAP are consistent with SB 375. Reductions for measures in the Built Environment and Transportation category are estimated from projected VMT which accounts for SB 375 consistency in the RTP/SCS as described above. The intent of these measures is to reduce VMT beyond the GHG and VMT projections already accounted for in the Regional Plan. Please refer to Master Response 2 related to the relationship between the CAP and SB 375.

O23-10 The comment requests clarification on how the County would ensure that any future General Plan Amendments will not inadvertently conflict with land use and transportation factors and/or assumptions for the unincorporated area that were used as the basis for SANDAG's GHG reduction analysis. Please refer to Master Response 2 on the relationship between the CAP and SB 375.

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OTHER SPECIFIC COMMENTS ON DRAFT DOCUMENTS

The following are additional specific comments and questions on the draft CAP and supporting documents. Please note that we are focusing our comments at this time on Chapter 3 (*Greenhouse Gas Reduction Strategies and Measures*). While we have made an effort to review all of the relevant documents that were listed in the Notice of Availability, we understand that other reviewers will be providing comments on more technical aspects of the CAP and DSEIR, and we assume that the County staff and consultants will be providing adequate responses to those comments.

P. 3-8. The CAP acknowledges that transportation is by far the largest contributor (45%) to its GHG emissions, yet the CAP proposes to implement measures that would produce only a 13% GHG reduction from this sector by 2030. While there is no requirement that each emission sector must be reduced in proportion to its contributions, the CAP appears to under-utilize "transportation" sector reduction opportunities, which then places a much greater burden on the County government, along with its residents and citizens, to reduce emissions from other sectors.

O23-11

P. 3-10. GHG Reduction Measure T-1.1 (Acquire Open Space Conservation Land) raises a number of questions. It is our understanding that for the approved MSCP South, the County has already committed to the open space acreages; one might therefore expect that those acres (regardless of the fact that some have not yet been secured) would be part of the "base case" and not credited as a new source of VMT-based GHG reductions. Also, while there is no current commitment to conserve open space (and eliminate development potential from) habitat lands within the MSCP North plan area, it is not certain whether that plan - and the MSCP East - will be approved and how much actual development potential will be removed from the existing conditions. This approach needs more clarification.

O23-13

P. 3-12. GHG Reduction Measure T-1.2 (Acquire Agricultural Easements) appears to be a feasible measure that is within the County's ability to implement. However, this is a voluntary measure and subject to the County finding funds to acquire the easements. This is an example where the County should clarify the potential costs for implementation, and identify potential funding sources. This issue applies to all voluntary measures and measure that have no existing funding or commitment to develop new funding sources.

O23-14

P. 3-14. GHG Reduction Measure T-1.3 (Updating Community Plans) appears to be a feasible measure, but needs more description and clearer performance metrics. This approach is a central tenet of SB 375 (regional transportation plan/sustainable community strategy), and the CAP should explain how this approach fits within the larger RTP/SCS for the San Diego Region. The proposed performance metric (update of 19 community plans) is not sufficient; a brief summary must be included to identify what criteria the County will apply to the community plan updates in order to ensure that the plans are leading to measurable GHG reductions. In addition, the County should make its best effort to expedite the completion of all 19 community plan updates that include villages; the proposed measure assumes that nearly half of the updates would not be completed until after 2030.

O23-15

P. 3-18. GHG Reduction Measure T-2.1 (Improve Roadway Segments as Multi-modal) should describe how the County will integrate this with other CAP measures (e.g., Update Community Plans) and

O23-16

O23-11 The comment introduces the next series of comments that are specifically related to Chapter 3 of the CAP. Please see responses below.

O23-12 The comment expresses concern that the County's greatest amount of GHG emissions are related to transportation, but the CAP relies on other sectors more to reduce emissions. The CAP contains 11 strategies, 30 GHG reduction measures and supporting efforts organized under five GHG emissions categories. The GHG reduction measures that are included in the CAP were chosen based upon many criteria, the most important of which is whether they are within the County's jurisdiction to control. The Built Environment and Transportation category contains measures that would reduce the number and length of vehicle trips through smarter land use planning, increase the use of alternative modes of transportation, and encourage a shift to electric and alternatively-fueled vehicles. The County's jurisdiction covers rural and semi-rural lands, along with suburban areas, many of which have limited transportation options and are served by limited transit. Thus, proposed transportation measures in the CAP focus on reducing VMT through improved design of development, infrastructure improvements, travel demand management programs, parking code revisions, and alternative fuel use. While the nature of trips will likely continue to be personal vehicle based, the fuel source and emissions factors of those trips can be modified by switching to renewable sources including electricity. Therefore, the County has included new GHG Reduction Measure T-3.5, Install Electric Vehicle Charging Stations, to increase the uptake of EV use in the unincorporated County. Refer to Master Response 6 related to transportation and GHG reduction measures.

O23-13 The comment asserts that the additional acreage acquired under Measure T-1.1 (Acquire Open Space Conservation Land) should be considered part of existing conditions as the County has already committed to the open space acreages for the approved MSCP South. Additionally, the comment states that there is no current commitment to conserve open space within the MSCP North and East areas, therefore, reduction in

development potential may not be achieved as envisioned under this measure. Please see the response to comment O1-14.

O23-14 This comment suggests that the County should identify potential costs and funding sources to implement GHG Reduction Measure T-1.2. The County acknowledges this comment. However, the comment does not address the adequacy of the Draft SEIR. The comment will be included in the Final EIR and made available to decision makers prior to a final decision on the project. See cost-benefit analysis of each of the GHG Reduction Measures in the attachment to the Planning Commission Hearing Report.

O23-15 The comment requests additional clarification regarding how GHG Reduction Measure T-1.3 would be implemented and how it supports the broader regional planning framework. 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. This action would require the County to determine which community plan areas are best positioned to support these types of planning activities and could produce the highest VMT reductions. 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 regarding community plan updates. Please also refer to pages 3-14 and 3-15 of the CAP. Regarding consistency with regional plans, please refer to Master Response 2 related to the CAP and consistency with SB 375.

O23-16 The comment suggests that the CAP should describe how GHG Reduction Measure T-2.1 would be implemented in coordination with other measures. T-2.1 will utilize enterprise efficiency and make improvements as part of regularly scheduled maintenance. Prioritization is determined through the Board of Supervisors. Improvement integration with T-1.3 can be evaluated when those community plans are under development. Measure T-2.1 could be integrated with Measure T-1.3, for example, by implementing multi-modal enhancements as part of a “Complete Streets” approach to reduce VMT, where maintenance and community plans overlap. “Complete Streets” that include sidewalk and bike lane improvements will be an integral part of the community plan updates required by Measure T-1.3. Please also see Master Response Number 5 Community Plan Updates.

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the regional RTP/SCS, and how the prioritization for improvements can best implement that integration.

O23-16
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It is important to note that, while the CAP identifies this measure as having a "high relative cost," the State of California has recently enacted legislation (SB 1 – 2017 Road Repair and Accountability Act), which will provide a significant new source of funding to the County of San Diego (along with other counties and cities) for improvements to existing roadways, possibly including "complete streets" elements. It is estimated that for FY 2017-18, SB 1 will provide the County of San Diego with over \$18 million in additional annual revenues for these purposes counties.org/sites/main/files/file-attachments/fy_2017-18_huta_and_sb_1_revenue_estimates_041317_0.pdf. In addition, SB 1 includes several other funding programs that may be available to the County and its partner transportation agencies for local and regional transportation projects and programs that could help the County meet its CAP objectives (see Attachment 2).

O23-17

P. 3-20 GHG Reduction Measure T-2.2 (Reduce New Non-residential Development Vehicle Miles Traveled) proposes to reduce commuter VMT in new non-residential development in the unincorporated County by 15% by 2030. It is our understanding that the County would implement this measure by adopting a Transportation Demand Management (TDM) ordinance that would apply to all new non-residential development. However, the draft CAP does not explain how the County would monitor the effectiveness of this measure; this should be clarified.

O23-18

Also, it is not clear why the County is not also recommending a similar measure for new residential development in the unincorporated County. There are a variety of feasible means by which the County could require developers of new residential and mixed-use development projects to reduce VMT associated with their projects. We would strongly recommend that the County consider such a measure, which would likely lead to significant additional GHG reductions in the "Built Environment and Transportation" category.

O23-19

P. 3-24 GHG Reduction Measure T-2.4 (Shared and Reduced Parking in New Non-Residential Development) appears to be a feasible measure. However, it should be noted that shared parking may also be feasible in mixed-use projects that include both residential and non-residential components; this should also be considered in drafting the proposed ordinance. It should also be noted that in many cases reductions in required parking will work best if accompanied by reliable and effective alternative (in terms of costs and utility) transportation options.

O23-20

Pp. 3-37 to 38 GHG Reduction Measure T-4.1 (Establish a Direct Investment Program). We agree that the County should allow for some flexibility to use established carbon credit programs. However, most of the programs and options in Technical Appendix B to the DSEIR are not operating within San Diego County, and the CAP does not provide any assessment of whether suitable conditions exist within the County to establish sufficient carbon credits.

O23-21

Furthermore, it appears from the description in DSEIR Section 2.7.5.1 that the County would allow "offsite" mitigation not only through "direct investment" credits from within San Diego County but also from any approved carbon credit providers outside of San Diego County. While the CAP suggests that all onsite mitigation measures would be applied before direct investment credits are used, the CAP provides no limits to how much offsite mitigation could be used. We

O23-22

O23-17 The comment provides information related to possible sources of funding to help implement GHG Reduction Measure T-2.1. This comment is acknowledged. The County has identified funding for measure T-2.1, however, it is acknowledged that SB 1 funds are a new and diverse source for future improvements for County transportation infrastructure; including new sources for active transportation improvements. The County has prepared a benefit-cost analysis which includes an estimate of the net benefits or costs to residents, businesses, and County operations that participate in, or comply with, the GHG reduction measures. This analysis is included as an attachment to the Planning Commission Hearing Report. The comment does not address the adequacy of the Draft SEIR, therefore, no further response is required or necessary. The comment will be included in the Final EIR and made available to decision makers prior to making a final decision on the project.

O23-18 The comment suggests that GHG Reduction Measure T-2.2 should include additional information related to how the effectiveness of TDM programs would be monitored. Chapter 5 of the CAP contains a comprehensive discussion about how the overall effectiveness of the CAP will be monitored. The performance standard is set through the reductions that must be achieved through this measure. However, detailed information related to performance metrics of this measure would be available at the time of ordinance adoption.

O23-19 The comment suggests that there are ways in which the County could require developers of new residential and mixed-use development to reduce VMT associated with their projects. Residential VMT is captured by GHG Reduction Measure T-1.3 which is the community plan update measure. The County acknowledges this comment. However, the comment does not provide specific suggestions. Therefore, no further response is required or necessary. This comment will be included in the Final EIR and will be made available to decision makers prior to a final decision on the project.

O23-20 The comment suggests that GHG Reduction Measure T-2.4 could be extended to mixed-use projects that include

residential and non-residential and that parking reductions function best when accompanied by alternative transportation options. As required by the CAP Checklist for New Development Item 3a, Shared and Reduced Parking, any non-residential component of a mixed-use development would be required to implement shared parking strategies. CAP Checklist for New Development Item 2a would apply to a mixed-use development project if the non-residential component met the parameters set forth in the CAP Checklist for New Development. This comment will be included in the Final EIR and will be made available to decision makers prior to a final decision on the project.

O23-21 The comment asserts that the CAP does not provide an assessment that suitable conditions exist within the County to establish sufficient carbon credits with GHG Reduction Measure T-4.1. Please see Master Response 3 pertaining to direct investments and Master Response 9 on the use of a program EIR and CAP as a programmatic analysis. The commenter also does not provide any evidence regarding what direct investment options are not suitable for the unincorporated County. To refine costs associated with GHG Reduction Measure T-4.1, the County has started a preliminary assessment of the local direct investment program that is required by 2020. This Preliminary Assessment of the County of San Diego Local Direct Investment Program (Ramboll, 2017) is included as an attachment to the Planning Commission Hearing Report and contains some project-level detail required by 2020 to implement the GHG Reduction Measure T-4.1. See also Response to Comment O1-22.

O23-22 The comment expresses concern regarding the approach to consistency with the CAP for General Plan Amendment (GPA) projects described on page 2.7-37 of the Draft SEIR. The comment appears to confuse the topic of “direct investments” and “carbon offset credits” as mitigation in the Draft SEIR. Direct investments projects, as would occur under the local direct investment program established by GHG Reduction Measure T-4.1 and required by 2020, would be used exclusively by the County to reduce emissions. Please refer to

the Draft SEIR pages 2.7-23 through 2.7-27 for a complete description of the application of that program. Also refer to Master Response 3 related to the topic of direct investments.

Carbon offset credits that could be used by GPA projects, after all feasible on-site mitigation is provided, are provided by external purveyors of carbon credits such as a CARB-approved registry, or other similarly vetted program, as described on page 2.7-38 and 2.7-39. Establishment of the local direct investment program or the use of carbon offset credits required by CAP Mitigation Measure M-GHG-1 to reduce cumulative impacts in the SEIR would not result in less investment in alternative transportation improvements as the comment suggests. Regarding the recommendation to apply SB 1 funds to projects and programs see Response to Comment O23-17. Please see Master Response 12 related to the mitigation hierarchy and use of carbon offset credits as Draft SEIR cumulative impact mitigation.

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have serious concerns regarding whether this option might undercut other feasible transportation-related GHG reduction measures, which could offer significantly greater co-benefits to the communities that they serve. In this regard, we also recommend that the County give serious consideration to the availability of additional State funding for transportation projects and programs as a result of enactment of SB 1 (see previous discussion).

O23-22
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We are also concerned that while this measure is listed in the category of "Built Environment and Transportation," the measure itself is not limited to projects that are directly related to GHG reductions in this category. As a result, the report appears to overstate the actual amount of GHG reductions from this category that are likely to occur.

O23-23

P. 3-40 The "Energy" portion of Chapter 3 of the CAP presents a comprehensive approach and set of measures that could substantially reduce this sector's GHG emissions. While we agree that the proposed achievement of 90% renewable electricity by 2030 (see GHG Reduction Measure E-2.1) is a strong commitment, many of the cities have committed to the goal of 100% renewable electricity by 2030, and we recommend the County give further consideration to setting a similar goal.

O23-24

At the same time, the large proposed contribution to GHG reductions (65%) from the Energy category by 2050 suggests that the County may be overly dependent on GHG reductions from this category, which may be due to the relatively low GHG reductions obtained from the "Built Environment and Transportation" category. We recommend that the County reevaluate its ability to find practical ways to further reduce GHG emissions from "Built Environment and Transportation" reduction measures.

P. 3-44 GHG Reduction Measure E-1.2 (Use Alternately-Powered Water Heaters in Residential Development). We support this measure, which is designed to reduce demand for natural gas to operate residential water heaters. However, we would also recommend that the County consider placing this requirement on water heaters in non-residential developments. In addition, we would recommend that the County consider similar requirements for replacement of gas furnaces and other similar equipment that requires County permits.

O23-25

P. 3-46 GHG Reduction Measure E-1.3 (Improve Building Energy Efficiency in Existing Developments). We agree that any remodel/renovation should be required to complete an energy audit. The audit should also include specific recommendations (including prioritizing by cost-effectiveness) for reducing energy use. However, we recommend that the County also consider establishing a minimum energy use reduction requirement for remodels and renovations, while at the same time helping to identify financial incentives and/or rebates that would offset some or all of the direct costs for meeting this requirement.

O23-26

P. 3-52 GHG Reduction Measure E-2.1 (Increase Renewable Electricity). As stated in the previous comment, we recommend the County consider adopting a 100% renewable electricity goal by 2030. We note that the DSEIR includes increasing renewable electricity as a reasonable and feasible alternative – albeit with potentially additional environmental impacts. Options like Community Choice Energy (CCE) could provide opportunities for reducing or at least moderating energy costs compared to existing costs.

O23-27

O23-23 The comment states the direct investment strategy 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 most generally related to activities affecting this sector (e.g., weatherization). Please see Master Response 3 regarding direct investments and the placement of Measure T-4.1 in the Built Environment and Transportation sector.

O23-24 The comment suggests that the County commit to 100% renewable energy and/or consider additional measures that would result in greater GHG emissions reductions from the Built Environment and Transportation Sector. However, the commenter does not provide any recommendations on how to find ways to further reduce GHG emissions from the Built Environment and Transportation sector. The County has included the 100% Renewable Energy Alternative (SEIR Section 4.3.3) for consideration by the Board of Supervisors. The comment does not address the adequacy of the Draft SEIR, therefore, no further response is required or necessary.

O23-25 The comment suggests that the County should consider expanding GHG Reduction Measure E-1.2 to cover water heaters in non-residential developments and for replacement of gas furnaces or similar equipment. The commenter does not elaborate on what other similar equipment would entail. Non-residential water heaters were not included in this measure because of the variety of end uses commercial and industrial water heaters could serve. Some establishments may use smaller hot water heaters than residential applications, such as for bathrooms, while others may use large boilers that provide hot water to multiple tenants or provide other large-scale manufacturing applications. Due to the variability in types of applications and the speculation projecting these various types of uses would require, the County has chosen to focus this measure on residential uses only. Please refer to Master Response 9 on the selection of measures in the CAP.

O23-26 The comment suggests that the County should consider establishing a minimum energy use reduction requirement for remodels and renovations, while at the same time helping to

identify financial incentives and/or rebates that would offset the costs. The comment does not address the adequacy of the Draft SEIR, therefore, no further response is required. However, this comment will be included in the Final SEIR and will be made available to decision makers prior to a final decision on the project. Please refer to Master Response 9 on the selection of measures in the CAP.

O23-27 The comment expresses support for adopting a 100% renewable energy goal and establishing a Community Choice Energy Program. The comment does not raise an environmental issue related to the adequacy of the Draft SEIR. Please see Response to Comment O23-24. Ultimately, adoption of a 100% renewable energy target and a Community Choice Energy program, or another program as required through the Renewable Energy Program in Measure E-2.1 is a decision for the Board of Supervisors.

County of San Diego
September 25, 2017

P. 3-56 GHG Reduction Measure E-2.3 (Install Solar Photovoltaics in Existing Homes). We support the CAP emphasis on increasing the use of solar photovoltaics (PV); however, past rates of PV installation are no assurance that future installation will continue at that rate. Currently, federal tax credits provide a significant incentive for private residence PV installations – and the County has no control over the continuance of those credits. The final CAP should address this concern.

O23-28

P. 3-58 GHG Reduction Measure E-2.4 (Increase the Use of Renewable Electricity for County Operations). It is not clear why the County is targeting only 10% renewable electricity by 2020 and 20% renewable electricity by 2030 for County operations – when the overall County target for renewable electricity (Measure E-2.1) specifies 90% by 2030. The County should require higher use of renewable electricity for its operations that is more closely aligned with the overall County targets for renewable electricity.

O23-29

Pp. 3-64 to 65 Water is and will continue to be a limited resource in San Diego and throughout California. We concur that reducing water consumption has multiple co-benefits beyond GHG emission reductions, and water conservation measures should be given a high priority. In particular, we support past efforts by the County and City of San Diego to promote the use of graywater for landscaping and other beneficial purposes, and to streamline the permitting requirements for installing graywater systems. We would encourage the County to continue to look for opportunities to promote graywater use, consistent with environmental health best practices.

O23-30

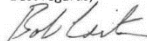
Pp. 3-82 to 90 We support the inclusion in the CAP of specific measures to increase carbon sequestration. The County should work with nurseries, native plant societies and forest advisory boards/groups to identify tree species that are effective and appropriate for carbon sequestration and are compatible with surrounding natural areas. It is also important to incentivize and promote the preservation of mature trees – trees with diameters over 16 inches—in addition to planting new trees. We urge the County to work with certified arborists and tree preservation societies to conduct educational campaigns to homeowners on how to water trees efficiently during a drought.

O23-31

Please feel free to contact STAY COOL Advisory Council members Bob Leiter at bleiter9@cox.net or Laura Schumacher at lauras@san.rr.com if you have specific questions regarding the comments contained in this letter.

O23-32

Best regards,



Bob Leiter
STAY COOL for Grandkids - Advisory Council Chair

Attachments:

1. Letter from David Engel, STAY COOL for Grandkids, ref. "Notice of Preparation Documentation for County of San Diego Climate Action Plan and General Plan Amendment," dated November 20, 2016.
2. California Bicycle Coalition, "Senate Bill 1 Fact Sheet," August 2017.

O23-28 The comment expresses concern regarding the use of historical rates of PV installation to predict future rates of PV installation and suggests that the County should address availability of subsidies that could drive this measure. The comment does not address the adequacy of the Draft SEIR. However, the historical PV installation rate in the unincorporated area was driven not only by incentives, but by the County's effort to streamline the process through the Renewable Energy Ordinance which allows homeowners to install up to 500 square feet of PV without a building permit. In addition, awareness about the cost effectiveness of solar systems has risen, along with incentive programs offered by the State. The County agrees that it cannot control the availability of incentives; however, based upon recent adoption of SB 350 which further illustrates the State's commitment to increasing energy efficiency, incentive programs may continue. Additionally, CARB's The 2030 Scoping Plan Update indicates that to achieve the State's 2030 GHG emissions reduction targets, continued investment in renewables, including solar roofs, wind, and other distributed generation will be required. The County does not currently have information related to the availability of incentive programs but will coordinate with other agencies to make that information widely available as it becomes known.

O23-29 The comment expresses concern that the County has only committed to 20% renewable energy on its own facilities by 2030 and suggests that it should be higher. Some County operations, such as office buildings and fleet maintenance facilities, are located within incorporated cities. The City of San Diego has established a 100% renewable electricity target for 2035; therefore, County operations located within the City would have a higher renewable mix once the City's plan is implemented. Please refer to Master Response 9 on selection of measures in the CAP.

O23-30 The comment suggests that the County should continue to pursue water conservation strategies, including through the use of graywater. The County acknowledges this comment. The comment does not address the adequacy of the Draft

	<p>SEIR, therefore, no further response is required. This comment will be included in the Final SEIR and will be made available to decision makers prior to a final decision on the project.</p> <p>O23-31 The comment expresses support for the inclusion of measures to increase carbon sequestration and incentivize the preservation of mature trees. Please refer to Master Response 11 regarding carbon sequestration and response to comment O20-9. The County acknowledges this comment. The comment does not address the adequacy of the Draft SEIR. No further response is required. This comment will be included in the Final SEIR and will be made available to decision makers prior to a final decision on the project.</p> <p>O23-32 The comment provides contact information. No response is required.</p>
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November 20, 2016

County of San Diego
 Planning and Development Services
 Attention: Bulmaro Canseco
 CAP Project Manager
 5510 Overland Ave, Suite 110
 San Diego CA 92123

RE: Notice of Preparation Documentation for County of San Diego Climate Action Plan and General Plan Amendment

Dear Mr. Canseco:

STAY COOL for Grandkids appreciates the opportunity to provide comments on the "Notice of Preparation Documentation" (NOP) for the proposed County of San Diego Climate Action Plan and General Plan Amendment, dated October 20, 2016. ***For your information, STAY COOL is a non-profit membership organization whose mission is to empower grandparents, in the name of their grandchildren, to become more aware of climate science and support public policy that will limit global warming.***

The NOP referenced above states, "the CAP is being developed in response to the previously described court ruling and State legislation and policies that are aimed at reducing statewide GHG emissions. This includes Executive Order (EO) S-3-05, which recommends a 2050 statewide GHG reduction target of 80 percent below 1990 levels; SB 32, which requires a 2030 statewide GHG reduction target of 40 percent below 1990 levels; and AB 32, which tasked the California Air Resources Board (ARB) with developing a Climate Change Scoping Plan to establish an interim target to achieve 1990 levels of GHG emissions by 2020 and provide a path for local governments to contribute their fair share of the GHG reductions necessary to achieve the target." **Overall, we strongly support the County of San Diego's intent adopt a new CAP that meets these stated purposes.**

However, we would like to raise the following issues and concerns regarding the NOP and the proposed scope of the EIR:

1. The Project Description in the NOP does not provide adequate information about the proposed CAP itself, including the methodology for establishing the baseline emissions inventory, the methodology for setting GHG emission targets in the CAP, and the range of possible measures that will be considered for inclusion in the CAP. This makes it extremely difficult to comment on the specific environmental issues that should be covered in the EIR.

2. The NOP does not adequately explain how previously initiated requests for County General Plan Amendments, such as the "Property Specific Requests General Plan Amendment" (<http://www.sandiegocounty.gov/content/sdc/pds/advance/PSR.html>), will be considered in the new CAP and the associated EIR. **We believe that the new CAP should focus on ways to meet the GHG reduction targets in conjunction with the implementation of the already adopted 2011 County General Plan, and that the EIR should evaluate the environmental impacts of implementing the adopted County General Plan and associated draft CAP.** Any proposed amendments to the 2011 County General Plan should be evaluated separately.
3. **The CAP and the associated EIR should address not only the direct responsibilities of the County of San Diego to reduce GHG emissions as its General Plan is implemented in the unincorporated areas of the County, but should also address how the new CAP will assist the overall San Diego region in meeting its SB 375 GHG reduction targets.** Specifically, it is our understanding that SANDAG used the adopted 2011 County General Plan land use designations and associated population, housing and jobs forecasts in performing the GHG reduction analysis for its Regional Transportation Plan / Sustainable Communities Strategy.
4. We understand further that SANDAG's GHG reduction analysis demonstrated that the region could meet the GHG reduction targets established for it by the California Air Resources Board (CARB) pursuant to SB 375, and that SANDAG's findings regarding compliance with the SB 375 targets were later reviewed and accepted by CARB. **Therefore, in formulating the new County CAP and evaluating it in the EIR, it should be recognized that any future changes to the County General Plan that would lead to greater GHG emissions from new development would need to be evaluated not only in terms of how they would affect the County's ability to meet its new CAP targets, but also how they would affect the ability of the San Diego region to meet its SB 375 mandated targets.**

We note that several other valid issues and concerns were brought up during the Scoping Meeting that was held by County staff on this NOP document on November 3, 2016. In addition, we expect that other agencies and organizations will be providing written comments on the NOP document prior to the November 21, 2016 deadline. **We believe it is very important for County staff to provide, in a timely manner, a written record of the comments they have received in response to the NOP document, and to prepare and distribute a written report explaining how they will respond to these comments.** We also strongly encourage County staff to conduct additional public outreach prior to the release of the draft CAP and EIR documents, including opportunities to discuss County staff responses to the NOP comments, as well as to allow for public discussion of the proposed components of the draft CAP.

Please feel free to contact STAY COOL advisory members Bob Leiter at rleiter9@cox.net or Laura Schumacher at lauras@san.rr.com if you have specific questions regarding the comments contained in this letter.

Sincerely,

David Engel
STAY COOL for Grandkids (SC4G) Advisory Board Chair
david@staycool4grandkids.org

SB 1 Fact Sheet

August 2017

How to Maximize Accessibility & Community Benefits from SB 1 Funding

1. Prioritize the 'highest transportation needs' based on social equity
2. Undertake inclusive outreach on guidelines & project planning
3. Support mode shift to cleaner transportation options—walking, bicycling, transit, & zero-emission vehicles
4. Require complete streets on all road projects
5. Reduce air pollution & climate change impacts, especially on our most vulnerable residents
6. Promote healthy communities
7. Advance housing affordability & avoid displacement
8. Protect natural lands and enhance regional sustainability
9. Expand access to jobs & workforce training
10. Set performance measures to meet state goals



For more info visit calbike.org/sb_1

SENATE BILL 1

2017 Road Repair & Accountability Act

Landmark Investment in Transportation

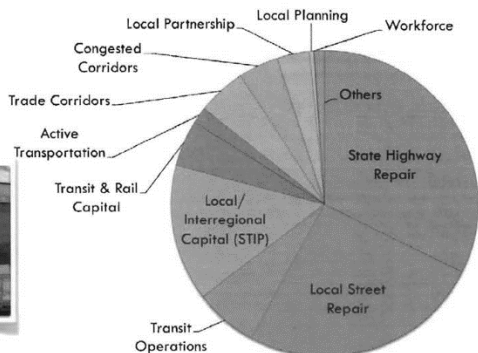
SB 1 was signed into law by Governor Brown on April 28, 2017, the first gas tax increase in California in over twenty years. The gas and diesel tax hikes go into effect November 1, 2017.



Significantly, SB 1 focuses more on maintaining and rehabilitating our aging roads and bridges than on expanding and building new roads. It also takes a positive step in increasing the state's investment in transit and active transportation. **However, the vast majority of SB 1 funds are still dedicated to roads and include highway expansion** as an eligible use in several programs, which will continue to subsidize driving as the primary mode of travel. (See the funding breakdown by program in the pie chart below.)

Only the Active Transportation and Intercity Rail Programs dedicate a minimum share toward providing benefits to disadvantaged communities, which are the most burdened and least well served from past investments.

SB 1 raises over \$5 billion annually in new transportation revenue.



Program by Program Overview

Program Title	Annual New SB 1 Funds	Program Focus	Decision-making agencies	Objectives & Eligible Projects
State Highway Operation & Protection	\$1.9 billion	Maintenance & Rehab	Caltrans	Meet targets for pavement, bridge, culvert state of good repair. Maintenance, rehab, safety projects on state highways eligible.
Local Streets & Roads	\$1.5 billion	Maintenance & Rehab	Cities & Counties by formula	Local streets maintenance & rehab, other projects if pavement is in good condition.
State Transit Assistance	\$390 million	Operations, Service	Transit Agencies by formula	Improve, operate, maintain existing transit service.
Transit & Intercity Rail	\$245 million	Capital Projects	California State Transportation Agency	Expand clean transit & rail lines. New buses, rail cars, track, electrification, etc eligible.
Active Transportation	\$100 million	Capital Projects	California Transportation Commission (CTC)	Increase walking & bicycling trips. Walk, bike projects & encouragement programs eligible
Trade Corridor Enhancement	\$300 million	Capital Projects	California Transportation Commission (CTC)	Improve movement of freight & reduce local impacts on disadvantaged communities.
Solutions for Congested Corridors	\$250 million	Capital Projects	California Transportation Commission (CTC)	Improve travel choices in highly congested areas. Managed/priced freeway lanes, transit, walk, bike projects eligible.
Local Partnership	\$200 million	Capital Projects	50% CTC competition, 50% 'self-help' agencies by formula	Incentivize adoption of local measures for transportation & leverage local funds. Road maintenance, rehab, & other projects.
Local Planning	\$25 million	Support	Caltrans	Grant for local & regional planning.
Workforce Development	\$5 million	Support	Workforce Development Board	Pre-apprenticeship programs for individuals with barriers to employment.

Timeline to Influence Programs: Caltrans and the CTC are holding public workshops now through December 2017 on the details of these programs. Attend a workshop and/or send comments, see the schedule for CTC workshops and adopting guidelines: goo.gl/U142ou
 Tip: Send comments ideally two weeks before draft guidelines are released to be most impactful.

Learn More

- Visit calbike.org/sb_1 for more details & resources.
- Find out how much your city or county will receive: goo.gl/3xpMC5 (counties), goo.gl/T1f99 (cities)
- Track what projects are being funded statewide: rebuildingca.ca.gov/map.html
- For information on CTC program guidelines and workshops: catc.ca.gov/programs/SB1.html

Get Involved

Contact us to help coordinate a local meeting in your area to discuss local needs that could be met with SB 1 funds. Join the statewide coalition working to influence the state guidelines process. Email chanell@climateplan.org or jared@calbike for more info. Reach out to your local city, county, or regional agencies to learn about and influence plans for spending SB 1 funds on projects in your local area.



For more info visit calbike.org/sb_1