Appendix A

Notice of Preparation and Comments

County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
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KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

NOTICE OF PREPARATION DOCUMENTATION

DATE: **REVISED** December 23, 2020

PROJECT NAME: COUNTY OF SAN DIEGO CLIMATE ACTION PLAN UPDATE

PROJECT NUMBER(S): PDS2020-POD-20-016 and PDS2020-GPA-20-004

PROJECT APPLICANT: County of San Diego – Planning & Development Services

ENV. REVIEW NUMBER: PDS2020-ER-20-00-002

This Notice of Preparation has been revised to extend the public review period and the date of the scoping meeting, as indicated on page 6. There are no other changes to this Notice of Preparation.

PURPOSE OF THE NOTICE OF PREPARATION:

The County of San Diego (County) is sending notice that a Supplemental Environmental Impact Report (Supplemental EIR) will be prepared for the Climate Action Plan (CAP) Update (hereafter, "CAP" or "project"). The County is seeking input from the public and agencies on potential environmental impacts of the CAP, ways to mitigate those impacts, and alternatives that may lessen those impacts. The County is also seeking input on potential GHG reduction strategies and measures to be included in the CAP. To review the impacts, mitigation measures, and alternatives from the 2018 CAP Supplemental EIR (2018 CAP SEIR), please see the following link: 2018 CAP SEIR.

The overall objective of the CAP is to reduce GHG emissions generated from activities within the unincorporated County (community) and GHG emissions generated by County facilities and operational activities throughout the County, including facilities and operations located within incorporated cities (County operations) to meet or exceed GHG reduction goals under State laws.

The County will conduct stakeholder outreach for the CAP. This Notice of Preparation is the first step in the CEQA process.

PROJECT BACKGROUND:

The County Climate Action Plan (2018 CAP) was adopted and the Final 2018 CAP SEIR was certified by the County Board of Supervisors on February 14, 2018. The 2018 CAP was adopted to comply with the County's 2011 General Plan Conservation and Open Space (COS) Goal COS-20, Policy COS-20.1, and 2011 General Plan Update Program Environmental Impact Report (2011 GPU PEIR) Mitigation Measures CC-1.2, CC-1.7, and CC-1.8. The General Plan Goal COS-20 requires reduction of community and County operations greenhouse gas emissions and Policy COS-20.1 requires preparation, maintenance, and implementation of a CAP. To review the Conservation and Open Space Element of the General Plan, see the following link: General Plan. The 2018 CAP required a General Plan Amendment (GPA) to update COS-20 and COS-20.1 to comply with existing State law. The 2018 CAP SEIR project included the 2018 CAP, this associated GPA to the County's 2011 General Plan and revision to the associated Mitigation Monitoring and Reporting Program, a threshold of significance for greenhouse gases (GHGs), and revised County Guidelines for Determining Significance for Climate Change.

After the County adopted the 2018 CAP and certified the 2018 CAP SEIR, the Sierra Club, Center for Biological Diversity, Cleveland National Forest Foundation, Climate Action Campaign, Endangered Habitats League, Environmental Center of San Diego, and Preserve Wild Santee filed a petition challenging the 2018 CAP as violating the California Environmental Quality Act (CEQA). In a separate action, Golden Door Properties, LLC, also challenged the 2018 CAP as violating CEQA. On December 24, 2018, the Superior Court ruled that the 2018 CAP approval did not comply with CEQA. The Superior Court ordered the County to set aside and vacate the February 14, 2018, approvals and the certification of the 2018 CAP SEIR. This decision was later affirmed in part by the California Court of Appeal, Fourth Appellate District (Appellate Court), on June 12, 2020, in Golden Door Properties, LLC, v. County of San Diego, 50 Cal. App. 5th 467. As a result, the County Board of Supervisors rescinded the 2018 CAP and 2018 CAP SEIR, and associated approvals, on September 30, 2020.

In addition to requiring rescission of the 2018 CAP and related approvals, the Superior Court ordered the County to submit an estimated schedule to prepare a new CAP and Guidelines for Determining Significance for Climate Change ("Guidelines"), and comply with CEQA and the State Planning and Zoning Law. The Superior Court has retained jurisdiction to determine compliance. In response to the court's decision, the County will prepare a CAP Update, Guidelines, and Supplemental EIR to address the court's opinion.

The County will continue implementing sustainability measures to reduce GHGs as part of its ongoing commitment to the environment and to progress towards accomplishment of statewide reduction targets. Information on the County's sustainability efforts and 2018 CAP and 2018 CAP SEIR documents are available at the following link: 2018 CAP.

PROJECT DESCRIPTION:

The CAP will include preparation of an updated GHG Emissions Inventory and Projections and preparation of updated GHG Emissions Targets to determine if additional or revised measures are needed. The Appellate Court struck down the 2018 CAP SEIR but did not find fault with the 26 GHG reduction measures in the 2018 CAP. The County may revise, expand, or replace the 2018 CAP GHG reduction measures and may prepare new GHG reduction measures for the project.

To incorporate GHG reduction goals under new State laws adopted since 2011, the project will include amendments to Goal COS-20 and Policy COS-20.1 of the General Plan and 2011 GPU PEIR Mitigation Measures CC-1.2, CC-1.7, and CC-1.8, similar to the 2018 CAP. Policy COS-20.1 was also amended in 2018 so that the CAP could be used in the analysis of cumulative GHG impacts of projects covered by the CAP (e.g., projects consistent with density allowed in the General Plan), pursuant to CEQA Guidelines section 15183.5. The amendments to Goal COS-20 and Policy COS-20.1, a threshold of significance for GHGs, and a revised Guidelines will be required. These actions, analysis of GHG reduction measures, and any other action necessary to comply with CEQA will be analyzed in the Supplemental EIR for the project. In addition to amendments to Goal COS-20 and Policy COS-20.1, refinements or additions to General Plan policies may be required as part of the project or a project alternative, which may require additional amendments to the General Plan. The Appellate Court also determined that the County was required to identify and analyze a “smart growth” alternative to reduce vehicle miles travelled and associated GHG impacts. The project will include at least one “smart growth” alternative and other alternatives as part of a reasonable range to reduce significant impacts from the project.

The Supplemental EIR for the project will serve two discrete purposes:

1. The Supplemental EIR will provide a program-level analysis of the project and actions described therein; and
2. The Supplemental EIR will address the court’s ruling and will supplement the 2011 GPU PEIR.

The CAP may consider strategies and reduction measures, and supporting efforts organized under the same five categories as the 2018 CAP:

1. Built Environment and Transportation;
2. Energy;
3. Solid Waste;
4. Water and Wastewater; and
5. Agriculture and Conservation.

CEQA REQUIREMENTS:

The California Environmental Quality Act (CEQA) requires that public agencies consider the potentially significant adverse environmental effects of projects over which they have discretionary approval authority before taking action on those projects (Public Resources Code [PRC] Section 21000 et. seq.). According to California Code of Regulations (CCR) Title 14, Section 15064(f)(1), preparation of an EIR is required whenever a project may result in a significant adverse environmental effect. An EIR is an informational document used to inform public agency decision makers and the general public of the significant environmental effects of a project, identify possible ways to mitigate or avoid the significant effects, and describe a range of reasonable alternatives to the project that could feasibly attain most of the basic objectives of the project while substantially lessening or avoiding any of the significant environmental impacts. Public agencies are required to consider the information presented in the EIR when determining whether to approve a project.

The CAP is a comprehensive plan for the County to identify the strategies, measures, and actions that would need to be undertaken to reduce GHG emissions consistent with legislative requirements. As such, consistent with the requirement of CEQA Guidelines Section 15168, the County is preparing a program EIR that evaluates the scope of actions proposed under the CAP.

The project will supplement the 2011 GPU PEIR. CEQA Guidelines sections 15162 through 15164 set forth the requirements for additional environmental review when there is a previously certified EIR covering the project for which a subsequent discretionary action is required. CEQA Guidelines, Sections 15162(a) and 15163, state that when an EIR has been certified for a project, no subsequent or supplement to an EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
    a. The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration; or
    b. Significant effects previously examined will be substantially more severe than shown in the previously adopted Negative Declaration or previously certified EIR; or
    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of

the project, but the project proponents decline to adopt the mitigation measure or alternative; or

d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

The project will require a Supplemental EIR pursuant to CEQA Guidelines section 15163 because the CAP updates and implements the General Plan Goal COS-20 and Policy COS-20.1; and Mitigation Measures CC-1.2, CC-1.7, and CC-1.8 of the 2011 GPU PEIR.

The CAP will also be used for future project-specific environmental documents by being prepared consistent with the tiering and streamlining provisions of CEQA Guidelines section 15183.5. The Supplemental EIR will provide the appropriate level of environmental review to allow future projects that are within the activities covered by the CAP (e.g., projects consistent with density allowed in the General Plan) to tier from and streamline their analysis of GHG emissions pursuant to CEQA Guidelines section 15183.5(b)(2).

PROJECT LOCATION:

The County of San Diego is located in the southwestern corner of the State. The County is bordered by the Pacific Ocean to the west, Riverside County to the north, Imperial County to the east, Orange County at the northwest corner, and the Republic of Mexico to the south (Exhibit 1).

The planning area for the CAP is the same planning area considered for the 2011 General Plan, which encompasses all unincorporated land in the County of San Diego (Exhibit 2). The unincorporated County is composed of 3,570 square miles and represents 84 percent of the total land area in the County.

PROBABLE ENVIRONMENTAL EFFECTS:

The County may utilize some or all of the 26 measures in the 2018 CAP as GHG reduction measures for the project, or other measures. The 2018 CAP SEIR identified significant impacts from implementation of these 26 measures for Aesthetics; Agricultural Resources; Air Quality; Biological Resources; Cultural, Historic, and Paleontological Resources; Energy; Greenhouse Gas Emissions; Hazards and Hazardous Materials; Hydrology and Water Quality; Land Use and Planning; Noise; Transportation and Traffic; and Tribal Cultural Resources. The Final 2018 CAP SEIR and potentially significant effects can be found here: 2018 CAP SEIR.

The following is a list of the subject areas to be analyzed in the Supplemental EIR:

Aesthetics	Agriculture and Forestry Resources
Air Quality	Biological Resources
Cultural Resources	Energy

Geology and Soils	Greenhouse Gas Emissions
Hazards and Hazardous Materials	Hydrology and Water Quality
Land Use and Planning	Mineral Resources
Noise	Population and Housing
Public Services	Recreation
Transportation	Tribal Cultural Resources
Utilities and Service Systems	Wildfire

PUBLIC SCOPING MEETING:

Consistent with Section 21083.9 of the CEQA Statutes, a public scoping meeting will be held to solicit comments regarding the scope and analysis of the Supplemental EIR. On March 17, 2020, California Governor Gavin Newsom issued Executive Order N-29-20, relating to the convening of public meetings in the State of California in response to the COVID-19 pandemic. The Executive Order outlined requirements for public meetings to take place telephonically or electronically without the need for the public or agencies to attend in person. This meeting will be held virtually on January 28, 2021, 6:00 p.m. to 8:00 p.m. Please follow this link for instructions on how to participate in this virtual scoping meeting: CAP Update.

Comments on this Notice of Preparation document will be accepted for 57 days following the issuance of the first notice on December 10, 2020, and must now be received no later than February 4, 2021. The County is providing 27 extra days. Comments on the Notice of Preparation document must be sent to Planning & Development Services (PDS) via email or to the address listed below and should reference the project numbers (PDS2020-POD-20-016 and PDS2020-GPA-20-004, and PDS2020-ER-20-00-002) and project name (County of San Diego Climate Action Plan Update).

Comment letters may be submitted electronically via e-mail at: CAP@sdcounty.ca.gov. Due to the COVID-19 pandemic and State orders, non-essential County staff are working remotely. The County requests that all comments be provided electronically. If a hard copy submittal is necessary, it may be submitted to:

County of San Diego
Planning & Development Services
Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Attachments:
Exhibit 1 Regional Map
Exhibit 2 San Diego County



Exhibit 1: Regional Map



Source: San Diego County

Exhibit 2: San Diego County

From: Rebecca Falk
To: CAP
Subject: question about crossover with the Renewable Energy Overlay Project
Date: Wednesday, December 23, 2020 2:24:05 PM

Hello,

I just received the notice of an update to the Climate Action Plan for SD County and there is a notice on the same web page about Land Use Overlays. Is the Renewable Energy Overlay Project one of those that will be part of this update?

That project has been the subject of comment from the Borrego Springs Community Sponsor Group and so if it is part of this update or will be considered during the update, I'd like to be informed of that.

Thank you,

Rebecca Falk, Chair
Borrego Springs Community Sponsor Group

From: CAP
To: Rebecca Falk
Subject: RE: question about crossover with the Renewable Energy Overlay Project
Date: Wednesday, January 6, 2021 8:19:13 AM

Hello Chairperson Falk,

Thank you for the email. The Renewable Energy Overlay Options project will not be a part of the Climate Action Plan Update process. That project is on a separate track and more information can be found on the Renewable Energy Overlay Options project website.

- https://www.sandiegocounty.gov/content/sdc/pds/advance/renewableenergyoverlay.htm

I hope this answers your inquiry. Please let us know if you have any additional questions.

Thank you and have a good one.

From: Rebecca Falk <rebfalk7@gmail.com>
Sent: Wednesday, December 23, 2020 2:24 PM
To: CAP <CAP@sdcounty.ca.gov>
Subject: question about crossover with the Renewable Energy Overlay Project

Hello,

I just received the notice of an update to the Climate Action Plan for SD County and there is a notice on the same web page about Land Use Overlays. Is the Renewable Energy Overlay Project one of those that will be part of this update?

That project has been the subject of comment from the Borrego Springs Community Sponsor Group and so if it is part of this update or will be considered during the update, I'd like to be informed of that.

Thank you,

Rebecca Falk, Chair
Borrego Springs Community Sponsor Group

From:	Descanso Planning Group
To:	CAP
Subject:	CAP NOP EIR comments
Date:	Friday, January 22, 2021 12:16:16 PM
Attachments:	Climate Action Plan NOP Comments.pdf

The Descanso Community Planning Group (DCPG) is submitting a comment letter regarding the County of San Diego Climate Action Plan Notice of Preparation of an Environmental Impact Report.
Please see the attachment.
We are urging the Planning and Development Services staff to think outside the box and consider our comments seriously. The DCPG considers the miss management of our local forests and wilderness areas to be significant sources of air pollution when they are ON FIRE. With proper tree mortality management and underbrush clearances as practiced in the Cleveland National Forest the Rancho Cuyamaca State Park's wildfire risks can be mitigated to a lower impact on our local communities, such as Descanso, Pine Valley, Alpine and Julian.
Regards,
Kerry Forrest, Chair
DCPG

DESCANSO COMMUNTIY PLANNING GROUP
Post Office Box 38, Descanso CA 91916-0038
January 21, 2021

GROUP MEMBERS

Seat 1:
Kerry Forrest, Chair

Seat 2:
Jo Ellen Quinting

Seat 3:
Wayne Hay

Seat 4:
John Elliott

Seat 5:
Mark Gassert

Seat 6:
William Bauer

Seat 7:
Terry Gibson

RE: Climate Action Plan Update Notice of Preparation

of an Environmental Impact Report

The Descanso Community Planning Group (DCPG) are providing their comments regarding the County of San Diego Climate Action Plan (CAP) Notice of Preparation (NOP) of an Environmental Impact Report (EIR).

"The 2018 CAP identifies 11 strategies and 26 measures plus numerous supporting efforts to reduce GHG emissions in the largely rural, unincorporated San Diego County as well as within County government operations. The 2018 CAP's strategies and measures are designed to reduce GHG emissions and achieve multiple secondary benefits including energy and water conservation, cleaner air, community health, biological resource conservation, cost savings, and job creation. 2018 CAP strategies and measures were selected based upon a review of potential available measures, their effectiveness in reducing GHG emissions, and their applicability to the unincorporated area "

The DCPG is providing these comments on the CAP Update. Planning and Development Services (PDS) is urged to "think outside of the box". Not just man-made sources of air pollution including GHG emissions should be addressed in the CAP. Forest Best Management Practices should be included within the proposed San Diego County Climate Action Plan. Specifically, the Cuyamaca State Park which is within the Cleveland National Forest. The State park consists of 26,000 acres. Approximately half is designated "Wilderness" and the rest is managed under the California State Park regulations.

Background:
Wildfires are a proven source of significant air pollution. The Cedar Fire of October 2003 included the burning of many homes within the Descanso Community as well as homes in the rest of the County. This fire emitted Carbon Dioxide, Sulfur Dioxide, Methane, Nitrous Oxide, Carbon Monoxide, and over 300,000 tons of particulate material into the atmosphere. We believe a large part of this was and is due to the mismanagement of the Cuyamaca State Park.

Specifically, regarding fuel management, California State Park and United States Forest Service forest management practices run in conflict with each other. The Cuyamaca Sate Park is within San Diego County, the Cleveland National Forest and borders the community of Descanso. The DCPG has an obligation to address this ongoing failure to responsibly manage the Cuyamaca State Forest.

Solution:
The 26,000 acres of the Cuyamaca State Park must apply the same forest management/tree morbidity control practices as the rest of the Federally controlled 465,000-acre Cleveland National Forest. Through the proper management of a healthy forest the impact of wildfires to air, water and land quality can be reduced significantly. The proper management of our local State Park ties in with the Climate Action Plan to reduce wildfire caused air pollution, carbon emissions, enhance water quality and protect our community from the impacts of Global Warming.

The DCPG urges PDS to use the CAP EIR process to look at the reduction of GHG's and Air Pollution through proper management of our State Forests. Through Best Management Practices by the State of California and possibly even the County Park Services, where tree morbidity and overgrowth is addressed and managed the goal of reducing air pollution, achieving clean water and safer communities can be achieved.

We look forward to the CAP EIR process and wish to be kept in contact with PDS regarding this especially important impact to our community.

Regards,

Kerry Forrest, Chair DCPG

Mark Gassert, Seat 5 DCPG

From: Charles Ritchie
To: CAP
Subject: Environmental improvement suggestions
Date: Thursday, December 10, 2020 10:50:13 AM

The best way to improve the atmospheric environment in San Diego county is to totally ban the use of gasoline powered lawn tools such as mowers, leaf blowers, hedge trimmers and so on. These items produce more air-pollution and noise pollution than any other group of causes!

From:	Craig Jones
To:	CAP
Cc:	Masada Disenhouse; Bee Mittermiller
Subject:	County revised CAP: environmental review; public scoping session
Date:	Thursday, December 10, 2020 11:15:44 AM

Please include me in notification for the upcoming County scoping session for environmental review for the County's CAP update. **Please let me know when this session is planned for** so I can protect my calendar.

Craig Jones
858-354-1785
bananashke@sbcglobal.net

From: CAP
To: Craig Jones
Cc: Masada Disenhouse; Bee Mittermiller
Subject: RE: County revised CAP: environmental review; public scoping session
Date: Tuesday, January 5, 2021 3:22:58 PM
Attachments: image001.png

Hello,

Thank you for your email and interest in the County of San Diego Climate Action Plan Update. This email is to confirm that your comment has been received and will be reviewed during the update process.

The virtual Project Public Scoping Meeting will be held January 28, 2021 from 6:00 pm to 8:00 pm. Visit this website for more information.

You can continue to receive updates on the Climate Action Plan Update by visiting our website (https://www.sandiegocounty.gov/content/sdc/sustainability/cap.html) and signing up for email updates.

Thank you again for your interest. Please let us know if you have additional questions or comments.

Best,
County of San Diego, Sustainability Team

Steven (Chad) Spoon
Advance Planning|Land Use/Environmental Planner - Sustainability
County of San Diego | Planning & Development Services
5510 Overland Ave, Suite 310, San Diego, CA 92123
858-505-6790 | Steven.Spoon@sdcounty.ca.gov

For local information and daily updates on COVID-19, please visit **www.coronavirus-sd.com.** To receive updates via text, send **COSD COVID19** to **468-311.**

Coronavirus Disease 2019 COVID-19

From: Craig Jones <bananashke@sbcglobal.net>
Sent: Thursday, December 10, 2020 11:16 AM
To: CAP <CAP@sdcounty.ca.gov>
Cc: Masada Disenhouse <masada.disenhouse@gmail.com>; Bee Mittermiller <beemitt@gmail.com>
Subject: County revised CAP: environmental review; public scoping session

Please include me in notification for the upcoming County scoping session for environmental review for the County's CAP update. **Please let me know when this session is planned for** so I can protect my calendar.

Craig Jones
858-354-1785
bananashke@sbcglobal.net

From: litning@cox.net
To: CAP
Subject: Climate Action Plan
Date: Thursday, December 10, 2020 11:28:29 AM

Buy San Onofre, keep it intact, consult with Genersl Atomics, and wait for the fusion reactor to come!!!!
JP Phelps
Alpine

Sent from MailDroid

From: Errol Carter
To: CAP
Date: Thursday, December 10, 2020 12:26:41 PM

Why would you worry about such a useless subject? This is a total waste of taxpayer dollars like most of your other endeavors.

From: Cody Harrison
To: CAP
Subject: Public Comments
Date: Thursday, December 10, 2020 6:35:41 PM

To Whom It May Concern,

I am writing to you as a local resident and owner of a small regenerative design-build cooperative called Corona Enterprises to urge you to make immediate and significant updates to the CAP. De-carbonizing San Diego will yield extremely minor changes in terms of the severity of climate change impacts this region experiences, due to the global nature of the greenhouse effect. The CAP would certainly yield benefits to resiliency by creating more local renewable energy production. good green jobs, improvements to infrastructure, etc., but if the rest of the world fails to act on GHGs this region will still experience catastrophic climate change. Furthermore, climate change is just one of the many planetary systems that needs to be functioning well for life to thrive on this planet, and according to the last assessment by the Stockholm Resilience Centre climate change was ranked 5th in terms of how far outside the "safe operating space" we are after biodiversity, disruptions to the N and P cycles, and land system change. Furthermore, we can address **all** our failing planetary systems more effectively, including climate change, if we address them at the same time, not in siloes.

Another question to consider when deciding how to move forward with regard to climate change: Why does the IPCC say that wetter soil decreases the severity of heat waves (with high scientific confidence) and that increased vegetation reduces regional warming (medium confidence) yet these potential pressure points for stabilizing regional climate don't seem to be making it into local climate action plans? And these are just two of the non-GHG pressure points mentioned in the IPCC report to keep the question somewhat digestible, but there are several others.
Source: https://www.ipcc.ch/site/assets/uploads/2019/08/Edited-SPM_Approved_Microsite_FINAL.pdf. The IPCC makes it quite clear that there are other human climate forcings besides just greenhouse gas emissions, and a Climate Action Plan that does not address these other forcings does a disservice to both the human and non-human inhabitants of this region.

I am always open to new information and try to stay away from "beliefs" but I am becoming more and more convinced that our strategy focused almost entirely on GHG mitigation is extremely sub-optimal. Even the small bit of climate change

adaptation work that is happening fails to take advantage of the mechanisms we have for stabilizing regional climate and creating resiliency to disturbance. Something to consider, when Jimmy Carter allegedly asked Charles Keeling for advice in 1978 on what the government should do about climate change, Keeling said that the problem was far too complicated for people to understand, so focus on greenhouse emissions. Is that the stance you want San Diego County to take as well? Or do you want to be world leaders in how to address this crisis in a way that is actually effective and acts on the best information science can offer us?

Warm Regards,
Cody Harrison



Cody Harrison
Beyond Sustainability Specialist, Corona Enterprises
434-242-6879 | www.corona-enterprises.com | Portfolio

From: edsuhay@cox.net edsuhay@cox.net
To: CAP
Subject: Question
Date: Friday, December 11, 2020 9:03:38 AM

In 1959 or 1960, I clearly remember the "SCIENCE" being taught in my 3rd grade class: It had been taught back then there had been SIX ICE AGES over Billions of years. According to these same SCIENTIST, there were no humans populating the planet back then. Not surprisingly, humans were never blamed for these life-altering global events.

Over the years, as recent as the 1970s, SCIENCE warned us about OVER-POPULATION was going to kill the planet.Of course, man was responsible for THIS condition. Immediately after that came the SCIENTISTS warning of "GLOBAL WARMING" in the 1990s and early 2000's. Man, again, was responsible. Today, these same "SCIENTISTS" call it "CLIMATE CHANGE", and of course, man is responsible for this too. The actual word for ALL of these global conditions is called "WEATHER" and it changes daily - with or without the presence of man (i.g.: see the first paragraph).

There's NO DOUBT man has some responsibility to make it sure he isn't damaging its environment but until the largest populations on the planet, accounting for three quarters of the world population: Communist China, India and Pakistan adhere to ANY level of reduction of "Green House Gases", any government in the United States of America is merely a pawn in the environmentalists game of hating America for which it stands - successful and fruitful living.

Are there problems? Of course. Adding taxes (which NEVER go to the claimed reason) on this country, especially this community, for things it isn't creating, is ludicrous and another shameful attempt to exploit money from the very taxpayers it is charged with the fuduciuary responsibility in protecting!

Shame of the San Diego County Board of Supervisors for even considering taking this seriously while our roads are falling apart and the homelessness population increases daily.

Edward Suhay

4711 Lorena Place

El Cajon, CA 92020

619-922-1307

From: edsuhay@cox.net edsuhay@cox.net
To: CAP
Subject: Question for CAP
Date: Friday, December 11, 2020 9:59:43 PM

In 1959 or 1960, I clearly remember the "SCIENCE" being taught in my 3rd grade class: It had been claimed back then there had been SIX ICE AGES over Billions of years. According to these same SCIENTIST, there were no humans populating the planet back then. Not surprisingly, humans were never blamed for these life-altering global events.

Over the years, as recent as the 1970s, SCIENCE warned us about OVER-POPULATION was going to kill the planet.Of course, man was responsible for THIS condition. Immediately after that came the SCIENTISTS warning of "GLOBAL WARMING" in the 1990s and early 2000's. Man, again, was responsible. Today, these same "SCIENTISTS" call it "CLIMATE CHANGE", and of course, man is responsible for this too. The actual word for ALL of these global conditions is called "WEATHER" and it changes daily - with or without the presence of man (i.g.: see the first paragraph).

There's NO DOUBT man has some responsibility to make it sure he isn't damaging its environment but until the largest populations on the planet, accounting for three quarters of the world population: Communist China, India and Pakistan adhere to ANY level of reduction of "Green House Gases", any government in the United States of America is merely a pawn in the environmentalists game of hating America for which it stands - successful and fruitful living.

Are there problems? Of course. Adding taxes (which NEVER go to the claimed reason) on this country, especially this community, for things it isn't creating, is ludicrous and another shameful attempt to exploit money from the very taxpayers it is charged with the fiduciary responsibility in protecting!

Shame of the San Diego County Board of Supervisors for even considering taking this Green House Gas claim seriously while our roads are falling apart, the homelessness population increases daily and nearly every small business owner (restaurant and retail stores) is being FORCED to shutter or SHUT-DOWN due to the China Covid-19 virus. There are more immediate impacts on our daily lives needing accurate reporting and guidance.

Edward Suhay

4711 Lorena Place

El Cajon, CA 92020

619-922-1307

From: Eck, Michael K CIV USN (USA)
To: CAP
Subject: Reducing energy transmission losses
Date: Monday, December 14, 2020 7:55:27 AM

Greetings,

I was reading that up to 13% of electrical energy is lost in distribution and transmission. The transmission of electricity has significant environmental impacts when one also considers the maintenance of the infrastructure and risk of wildfires.

The risk of wildfires pushes SDG&E to shut off power in East County for days and residents have to use small inefficient generators even if they have solar due to loss of grid synchronization.

Advances in batteries now permit high round trip efficiencies, safety, and 20+ year life expectancies.

Has the CAP program investigated the feasibility and possibility of permitting/encouraging off grid construction, particularly in rural San Diego to meet the CAP?

Thank you.

Mike

From:	Les Ferguson
To:	CAP
Subject:	Re: Manure management
Date:	Wednesday, December 16, 2020 2:15:38 PM

I believe a large portion of the manure concern involves horse manure. It's different than that from cattle, and is easily recycled and transformed into a beneficial agriculture product. There were, not long ago several small worm farms in a co-op that used horse manure exclusively. Most went out of business due to marketing issues and participants creating issues, selling outside the Co-op. A few businesses still exist. All it requires is the manure be set aside, wet to reduce urine, and then semi-dry (to avoid heat buildup, and be palatable to the worms). Then feed the product to the worms with occasional wetting to keep the conditions livable.

How is this a benefit? Worm castings (poop) are a natural fertilizer used in organic farming. They are like grains of sand, and naturally encapsulated, making them time released food for the plants. They are also a natural, harmless insecticide that not only promotes growth, but also protects some plants from many harmful insects.

You could mandate that stables of a certain size, recycle their manure in this manner. They could do it themselves if they can find an outlet, or have it removed by the worm farms that need the manure.

I had one of these farms, but had to abandon it due to a combination of health issues and others not doing their share of harvesting. It was easy to set up, and would have been easier with larger equipment to move it. One small farm produced two truckloads of castings. I set my farm up in one day, and it only needed about five hours a week with a shovel to feed the worms until harvest.

I know this proposal sounds of the wall, but it has been done, and it would have been successful without the issues of packaging and distribution after some members went rogue. I've seen truck loads of this coming out of Mexico, being delivered into the US for organic farms, so a market still viably exists.

I hope this was helpful, Les Ferguson highlanderiam@aol.com

From:	Les Ferguson
To:	CAP
Subject:	CAP updates
Date:	Wednesday, December 23, 2020 5:32:01 PM

Re: green building requirements.
I see that a goal is to reduce costs for energy by building more smart homes that consume less energy.
You state: "Some of the key benefits are:

- Lower electric and water utility costs."

This does not reduce energy costs for the district, but actually increases them for the general population. It forces SDG&E to increase their energy pricing to recover lost revenues due to any private solar installations.
Therefore you are only benefiting those who occupy new homes meeting your goal.
Even if these are considered new homes that SDG&E has no contract with, they will still have to be outfitted with a new power grid, costing a substantial amount that will likely never be recovered by utility usage.
Though I think the requirement to reduce non-renewable energy in new construction is a good thing, you are misrepresenting its outcome to the general public as lowering electrical costs, when in fact we are being forced to pay substantially higher prices per KWH than ever before. Even SDG&E has stated they had to increase their prices to cover their losses in sales due to solar installations.
Perhaps more clarity in the goal would be in line to promote transparency in these efforts.
Thank you, Les Ferguson

From: Arne Johanson
To: CAP
Subject: CAP Trees?
Date: Thursday, December 24, 2020 1:55:00 PM

How much carbon is sequestered by each tree planted in a County park? How is this calculated? Does it include both above ground and underground storage? How long a time does the carbon remain sequestered before being released back into the environment?

Thank you,

Arne Johanson
17269 Silver Gum Way
San Diego

From: Arne Johanson
To: CAP
Subject: CAP - Wildfire Risk
Date: Thursday, December 24, 2020 2:00:33 PM

Hi,

I am wondering how much carbon is released each year from county wildfires? I don't see where this is considered in the plan. What measures would be taken to assure that wildfires be less frequent?

Thank you,
Arne Johanson
17269 Silver Gum Way
San Diego

From: Arne Johanson
To: CAP
Subject: CAP - Alternate Transportation
Date: Thursday, December 24, 2020 2:10:23 PM

Hi,

For as long as I can remember there has been a, so called, trail system in the county. Very little has ever been done to build the system even through County owned lands. Very little has been done to build bike lanes along roadways except for a few disconnected white lines. In places where bikes work they have separate dedicated bike/pedestrian pathways. Why is this not included in your plan? All I see is more lip service to the idea with no intent to use this option. Where are the details if I am wrong?

Thank you,
Arne Johanson
17269 Silver Gum Way
San Diego

From: Arne Johanson
To: CAP
Subject: CAP - Energy Efficiency
Date: Thursday, December 24, 2020 2:32:14 PM

Hi,

I would think that retrofitting older structures would produce very effective (and cost-effective) results. I do not see any measures to help people retrofit their buildings. Am I missing this or is this not part of the plan? While I do not need help, I know many would be willing to make their structures more energy efficient and comfortable, they simply don't have the resources to do that. How can the Cunty help those in need?

Arne Johanson
17269 Silver Gum Way
San Diego

January 21, 2021

TO:
County of San Diego
Planning & Development Services
Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123
via CAP@sdcounty.ca.gov

Re: Submittal in Response to the Notice of Preparation, Project Numbers: PDS2020-POD-20-016 and PDS2020-GPA-20-004; Environmental Review Number: PDS2020-ER-20-00-002 - Supplemental Environmental Impact Report (Supplemental EIR) for the Climate Action Plan Update project

This submittal is made for the record in response to the County's issued Notice of Preparation for this CAP update. Immediately below in synopsis are key points of this submittal, but these do not exclude from the record the entirety of this submittal further below:

- This new update of the County's Climate Action Plan must include assessment of the pattern of land use approvals by the County, including "sprawl" land use approvals, on the generation of climate-change causing GHGs as well as other pollutants.
- The supplemental EIR must thoroughly assess how differing patterns of land use approval affect production of GHGs and other pollutants across a full range of environmental concerns.
- The supplemental EIR must assess how differing patterns of land use approval will comply or not comply with SB 743's intent of reducing vehicle miles traveled, VMT.
- The supplemental EIR must have as the preferred proposed project, a CAP which expressly prohibits County land use sprawl development approvals. Should the County fail to do this in the supplemental EIR, there must be a fully developed project alternative which does so, and this alternative must be assessed for environmental impacts and reductions as fully as the preferred project.
- The supplemental EIR must fully assess growth-inducement from differing patterns of land use approvals by the County, looking especially at the full range of environmental impacts created by induced sprawl development.
- Any CAP, supplemental EIR and/or statement of overriding considerations attempting to justify allowing County sprawl development on additional housing production need, must take into assessment *all* regional jurisdiction housing production approvals above and beyond previously-planned limits since the 2011 County General Plan Amendment.
- The County's study of land use alternatives in this CAP revision must address how different land use development patterns, notably sprawl, affect racial, social and economic segregation – the real phenomenon of "white flight" in creating school and community segregation, and social, economic and political disparity in older communities, especially those historically "red-lined." The supplemental EIR must include this consideration and its relationship to the full range of environmental impacts.

The heart of this submittal is recognition that the County cannot hope to, and will not, have an adequate climate action plan and will not adequately control emissions of GHGs (greenhouse gases) or comply with SB 743 *unless the County prohibits and ceases to approve sprawl development:* urban/suburban land development in rural, outlying, agricultural, and/or biologically sensitive lands throughout the county region. The updated CAP must incorporate a policy for such ban and prohibition as a central piece of its enforceable provisions; and the

preferred, proposed project in this supplemental EIR must be one which includes this prohibition without exceptions or loopholes.

In the updated CAP, the baseline land use plan for the County against which to allow and prohibit development, must be the *San Diego County General Plan update of 2011*. The reason for this is, the 2011 County general plan update was adopted *for the express purpose of establishing environmental impact limits to continued County land development*. This was after grueling review, and environmental review of the 2011 update establishing its impact limit measures and obligations. To illustrate, in the 2011 General Plan Update EIR, to assess impacts related to air quality, the County made this obligation:

General Plan Update EIR, Page2.3-28
https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_2.03_-_Air_Quality_2011.pdf
Ref. the third sentence from the bottom:

2.3.4 Cumulative Impacts

The geographic scope of cumulative impact analysis for air quality includes the County and surrounding vicinity. This includes the San Diego region or the airshed for reactive air pollutants and surrounding vicinity for nonreactive or less reactive pollutants.

2.3.4.1 Issue 1: Air Quality Plans

Cumulative projects located in the San Diego region would have the potential to result in a cumulative impact to air quality plans if, in combination, they would conflict with or obstruct implementation of the RAQS and/or applicable portions of the SIP. Projects that are inconsistent with the regional planning documents that the RAQS and SIP are based on would have the potential to result in cumulative impacts if they would include development beyond regional projections. For example, the proposed Meadowood Development in Fallbrook, included in Table 1-11, Projects Not Included In the Proposed General Plan Update Land Use Map, would construct 1,200 new residential units. The project would require an amendment to the existing General Plan, and therefore may propose development beyond what is accounted for in the RAQS and SIP, which is based on General Plan projections. However, cumulative projects shown in Table 1-11, Projects Not Included in the Proposed General Plan Update, such as the Meadowood project, are still required to show compliance with applicable air quality plans during CEQA review and prior to project approval. Cumulative projects located in adjacent jurisdictions, including incorporated cities, adjacent counties, and State-managed lands, would be required to comply with the SIP, and the RAQS or other applicable regional air quality plan. Projects in Mexico and on tribal lands and federally managed lands would not be subject to the SIP or the RAQS. Therefore, cumulative projects in the region would not result in a significant cumulative impact associated with conflicts with air quality plans. The proposed project would ultimately be used as the basis for future updates to applicable air quality plans. Development in the County would be required to comply with the General Plan Update or would not be approved. Additionally, cumulative projects not included in the proposed General Plan Update would be required to show compliance with applicable air quality plans or would not be approved. Therefore, the proposed General Plan Update would not contribute to a significant cumulative impact.

This promise and obligation was made to meet State CEQA regulations, in order to approve the 2011 Update. It constitutes a legally enforceable promise and obligation to avoid significant unmitigable impacts. Beyond air quality, the same linkage can be made between limiting land use sprawl and avoiding a myriad range of other environmental impacts (water/hydrography runoff impacts to water quality, biological/wildlife impacts, energy use impacts, archeological/cultural resources, public services and safety re: fire protection, schooling, police; and more) - *all of which also must be freshly addressed and assessed for this new project in this new supplemental EIR.*

Notwithstanding its 2011 promise and obligation, County staff, Planning Commission and Board of Supervisors have subsequently been approving land use element changes and developments which clearly violate this obligation, constitute sprawl, and "bust" the 2011 General Plan. In doing so, the County has not only violated

its legal obligation opening itself to litigation; it also has violated its moral obligation to the citizens of our region to stick to its promise and reduce the full range of resulting environmental and social impacts. Not only does sprawl create and exacerbate the range of environmental sectors noted above; it also fuels racial, social and economic community segregation – noted as "white flight" and including a broader range of class/economic separation – which has not only negative social and economic impacts, but also negative impacts in the cost and efficiency of school, fire, and police services; and the cost of infrastructure maintenance. Such sprawl developments include, but are not limited to, the following:

- "Newland Sierra," approved by Board of Supervisors October 2018; allowing up to 2,199 housing units and 1,777,684 square feet of commercial space; instead of the 2011 General Plan allowance of up to 99 housing units and up to 2,000,000 square feet of commercial space. Subsequently forced to go to public referendum, in the March 2020 election residents rejected Newland Sierra slated for Merriam Mountain reversing the Board's approvals.
- "Otay Ranch Village 14,"approved by Board of Supervisors June 26, 2019; for approximately 1,100 new homes and 10,000 square feet of commercial space in the remote unincorporated area, notwithstanding wildland fire hazard and loss of crucial environmental habitat; and with prices expected to start in the half million dollar range, the project would do nothing to alleviate the need for affordable housing.
- "Valiano and Harmony Grove Village South," approved by Board of Supervisors July 25, 2018; Valiano for 326 plus houses, Harmony Grove Village South for 4453 dwellings; both projects granted General Plan Amendments breaking the 2011 General Plan. Approvals set aside by court ruling on Feb. 20, 2020, the judge ruling that the county should set aside the Board of Supervisors' July 25, 2018, approvals because they were granted based on inadequate environmental documentation that failed to address key issues, including greenhouse gas emissions mitigation and fire evacuation concerns.
- "Otay Ranch Resort Village," approved by Board of Supervisors November 19 2020; allowing 1937 dwelling units (1881 single family, 57 multifamily) and 40,000 sq. ft. of commercial/office using 779.6 acres; instead of its EIR-identified environmentally-preferred development alternative of 465 dwelling units using 224 acres
- "Lilac Hills Ranch:" first proposed in 2005,in 2009 county staff planners rejected the project, saying it was out of step with the county's plan to concentrate housing development in village areas, rather than maintaining the county's patterns of sprawl; the developer appealed that determination to the county Planning Commission, and won; then in 2015, county staff planners recommended approving the same project notwithstanding its inconsistency with the 2011 General Plan, the Planning Commission voted to approve, but it never went for a full vote after Supervisor Bill Horn recused himself due to financial conflicts of interest from developable land he owned nearby; the project then went before voters in 2016 and was rejected by a wide margin. When the developer came back yet again, and the Planning Commission determined to not change its 2015 approval, in August 2020 the Board of Supervisors rejected the proposal. Lilac Hills would have allowed over 1700 dwelling units plus commercial, instead of the 2011 General Plan allowance of 110 dwelling units.

In the event that the County's revised CAP, the supplemental EIR, and/or any CEQA statement of overriding considerations, cites a need for additional housing production to address housing and affordable housing needs as a justification for not prohibiting sprawl development, the County's assessment of such must include and take into consideration *all San Diego regional jurisdiction's* development and land use approvals since the 2011 General Plan Update, which have expanded the allowance of number of housing units over previously-allowed limits; expressly for the purpose of demonstrating that housing production approvals above previously-planned limits, notably those within already-urbanized areas, have provided substantial and significant additional housing opportunities to meet need. The County's compendium of such approvals must contain, but certainly is not limited to, the following:

- "Riverwalk San Diego," approved by San Diego City Council Nov. 2020; located at 1150 Fashion Valley Road (Mission Valley) will turn the Riverwalk Golf Club into a neighborhood while also restoring the part

of the San Diego River that runs through it. Out of the 4,300 units of housing, 430 of the units will be affordable housing at 65% of the median area income. There will also be a 47 acre river park, a trolley station, and the current golf course clubhouse will be turned into a community center.

- "SDCCU Stadium Project," approved by San Diego City Council May 29 2020; voters approved the sale Nov. 2018; the $3.5 billion project would include 4,600 housing units with 10 percent of them set aside for low-income households
- Pending City of Escondido, "Palomar Heights" project; proposal to demolish the old Palomar Hospital facility in central Escondido and replace it with 510 apartment and townhome dwellings with approx. 10,000 sq. ft. commercial. This replacement of the previous hospital campus is a net increase of this number of dwelling units in an already-urbanized core.
- "Ulric Street Apartments," City of San Diego Housing Commission/Community Housing Works; under construction; 95 affordable apartment units guaranteed for 55 years for households 30%-60% of area median income.
- The total of accessory housing unit/"granny flat" projects completed throughout the San Diego region, pursuant to State legislation; this information will be available from all jurisdictions in the region, the County and all cities.

Please put me on the County's notification list for all upcoming meetings and hearings regarding the supplemental EIR and the CAP.

Sincerely,

Craig Bruce Jones
10055 Wildlife Road
San Diego, CA 92131

From:	Angelina Gutierrez
To:	CAP
Cc:	Desiree Morales Whitman
Subject:	Climate Action Plan Update
Date:	Monday, December 28, 2020 3:42:04 PM
Attachments:	image001.png Climate Action Plan Update.pdf

Please see attach file. Thank you

Regards,

Angelina Gutierrez
THPO Monitor Supervisor
San Pasqual Environmental Department
angelinag@sanpasqualtribe.org
Phone (760) 651-5219
Cell: (760) 803-5648



IPAI

SAN PASQUAL BAND OF MISSION INDIANS

SAN PASQUAL RESERVATION

TRIBAL COUNCIL

Stephen W. Cope
Chairman

Justin Quis Quis
Vice Chairman

Tilda M. Green
Secretary-Treasurer

David L. Toler
Councilman

Joe Chavez
Councilman

December 28, 2020

County of San Diego
5510 Overland Ave. suite 310
San Diego, CA.92123

RE: Climate Action Plan Update

Sent via E-mail- Due to COVID -19

Dear Ms. Bray,

The San Pasqual Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of David L. Toler THPO Officer.
We have consulted our maps and determined that the project as described is not within the boundaries of the recognize San Pasqual Indian Reservation. The project is within the boundaries of the territory that the tribe considers its Traditional Use Area (TUA). Therefore, we request to be kept in the information loop as the project progresses and would appreciate being maintained on the receiving list for project updates, reports of investigations, and/or any documentation that might be generated regarding previously reported or newly discovered sites. Further, we may recommend archaeological monitoring pending the results of site surveys and records searches associated with the project. If the project boundaries are modified to extend beyond the currently proposed limits, we request updated information and the opportunity to respond to your changes. Also, San Pasqual Band of Mission Indians can provide Native American monitoring if needed for this project.

We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone 760-651-5142 or by e-mail at Thpo@sanpasqualtribe.org please CC: Angelinag@sanpasqualtribe.org thank you.

Respectfully,

Angelina Gutierrez

Angelina Gutierrez
Tribal Historic Preservation Office, Monitor Supervisor
San Pasqual Band of Mission Indians

From:	Cheryl Madrigal
To:	CAP
Cc:	Deneen Pelton
Subject:	Climate Action Plan - NoP of an EIR
Date:	Monday, January 4, 2021 10:44:08 AM
Attachments:	Climate Action Plan Update.pdf

Ms. Bray,

Please see attached response letter to above mentioned project. If you have any questions or comments, please contact us.

Thank you for the opportunity to protect our cultural assets.

Cheryl

Cheryl Madrigal
Cultural Resources Manager
Tribal Historic Preservation Officer
Cultural Resources Department
Rincon Band of Luiseño Indians
1 West Tribal Road | Valley Center, CA 92082
Office:760-297-2635 ext. 323|Cell: 760-648-3000
Fax: 760-749-8901
Email: cmadrigal@rincon-nsn.gov

Rincon Band of Luiseño Indians
www.rincon-nsn.gov

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Rincon Band of Luiseño Indians
CULTURAL RESOURCES DEPARTMENT

One Government Center Lane | Valley Center | CA 92082
(760) 749-1051 | Fax: (760) 749-8901 | rincon-nsn.gov

January 4, 2021

Sent via email: CAP@sdcounty.ca.gov
County of San Diego
Planning & Development Services
Kelly Bray
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: Climate Action Plan Update; PDS2020-POD-20-016, PDS2020-GPA-20-004, LOG NO. PDS2020-ER-20-00-002

Dear Ms. Bray,

This letter is written on behalf of the Rincon Band of Luiseño Indians ("Rincon Band" or "Band"), a federally recognized Indian Tribe and sovereign government. We have received your Notice of Preparation of an Environmental Impact Report for Climate Action Plan and we thank you for the opportunity to consult on the project. The identified affected location is within the Traditional Use Area (TUA) of the Luiseño people and within the Band's specific Area of Historic Interest (AHI). As such, Rincon is traditionally and culturally affiliated to the project area.

The Band would like to discuss the draft EIR and we kindly ask to be provided with dates and times of your availability. If you have additional questions or concerns, please do not hesitate to contact our office at your convenience at (760) 297-2635 or via electronic mail at cmadrigal@rincon-nsn.gov. We look forward to working together to protect and preserve our cultural assets.

Sincerely,

Cheryl Madrigal
Tribal Historic Preservation Officer
Cultural Resources Manager

Bo Mazzetti, Chairman | Tishmall Turner, Vice Chair | Laurie E. Gonzalez, Council Member | John Constantino, Council Member | Joseph Linton, Council Member

From: Bray, Kelly
To: Cheryl Madrigal; CAP
Cc: Deneen Pelton
Subject: RE: Climate Action Plan - NoP of an EIR
Date: Wednesday, January 6, 2021 10:28:24 AM
Attachments: image002.png

Hi Cheryl,

Nice to meet you and thanks for reaching out about the CAP Update project. Please do plan to attend the NOP Scoping Meeting and submit your comments in writing (we will submit those that you have already attached to this email as well).

We are still in the process of selecting an EIR consultant for the project and will be happy to meet and discuss the project in detail with you once we have executed the contract.

We look forward to working with you on this important project!

Kelly

Kelly Bray
Advance Planning| Project Manager-Sustainability
County of San Diego | Planning & Development Services
5510 Overland Ave. Suite 310
San Diego, CA 92123
✆ 619.756.5903
Kelly.Bray@sdcounty.ca.gov

For local information and daily updates on COVID-19, please visit **www.coronavirus-sd.com.** To receive updates via text, send **COSD COVID19** to **468-311.**

Coronavirus Disease 2019
COVID-19

From: Cheryl Madrigal <CMadrigal@rincon-nsn.gov>
Sent: Monday, January 4, 2021 10:43 AM
To: CAP <CAP@sdcounty.ca.gov>
Cc: Deneen Pelton <DPelton@rincon-nsn.gov>
Subject: Climate Action Plan - NoP of an EIR

Ms. Bray,

Please see attached response letter to above mentioned project. If you have any questions or comments, please contact us.

Thank you for the opportunity to protect our cultural assets.

Cheryl

Cheryl Madrigal
Cultural Resources Manager
Tribal Historic Preservation Officer
Cultural Resources Department
Rincon Band of Luiseño Indians
1 West Tribal Road | Valley Center, CA 92082
Office:760-297-2635 ext. 323|Cell: 760-648-3000
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Rincon Band of Luiseño Indians
www.rincon-nsn.gov

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From:	Dodson, Kimberly@DOT
To:	CAP
Cc:	State.Clearinghouse@opr.ca.gov; Eaton, Maurice A@DOT; Lecourtois, Charlie@DOT; Bray, Kelly
Subject:	County of San Diego Climate Action Plan Updated NOP SCH# 2020120204
Date:	Wednesday, February 3, 2021 2:18:29 PM
Attachments:	SD-VAR_County of San Diego Climate Action Plan NOP SEIR 02-03-2021.pdf

---

Greetings:

Please see the attached comment letter.

Thank you,

Kimberly D. Dodson, GISP
Associate Transportation Planner
Caltrans District 11 LD-IGR Branch
4050 Taylor St., MS-240
San Diego, CA 92110
Kimberly.Dodson@dot.ca.gov
Telework phone: 619-985-1587

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
4050 TAYLOR STREET, MS-240
SAN DIEGO, CA 92110
PHONE (619) 688-3137
FAX (619) 688-4299
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

February 3, 2021

11-SD-VAR
PM VAR
County of San Diego Climate Action Plan Update
NOP/Supplemental EIR/SCH #2020120204

Ms. Kelly Bray
Sustainability Project Manager
County of San Diego
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Dear Ms. Bray:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the County of San Diego Climate Action Plan (CAP) Update Notice of Preparation/Supplemental Environmental Impact Report (NOP/Supplemental EIR) (SCH #2020120204) located throughout various routes in the County of San Diego. The mission of Caltrans is to provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following comments:

Caltrans recommends collaboration between our agency and the County of San Diego on the proposed transportation related strategies, measures, and actions outlined in the CAP Update, and SEIR.

Transportation projects within the County pose excellent opportunities to employ strategies, measures, and actions outlined in the CAP Update that are also consistent with Caltrans Sustainability initiatives. Additionally, Caltrans and the County of San Diego may be able to collaborate on a local and regional level regarding emergency preparedness and evacuation routes (such as extreme weather and wildfires).

Caltrans D11 Vulnerability Assessment Summary and Technical Report (https://transplanning.onramp.dot.ca.gov/climate-change-vulnerability-assessments-0) are available for the County to utilize in their CAP Update implementation.

Consider addressing the impacts on housing affordability within the strategies in the CAP Update.

Traffic Engineering Analysis

- Caltrans agrees with the proposed Policy M-5.2 under Section 2.12.2 that the County coordinate with Caltrans to mitigate negative impacts.

- Caltrans agrees with the proposed CAP Update Mitigation Measure M-TRAF-1 under Section 7.1.12 Transportation and Traffic that mitigation measures for project-specific shall be incorporated during the environmental review process for future Major Use Permit.

- Caltrans recommends considering the addition of teleworking discussions with regard to VMT reduction.

Complete Streets and Mobility Network

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation system. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promote a complete and integrated transportation system.

Early coordination with Caltrans, in locations that may affect both Caltrans and the County of San Diego is encouraged. To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs.

Caltrans looks forward to working with the County to implement Complete Streets concepts and evaluate potential Complete Streets projects.

Land Use and Smart Growth

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation system integrated through applicable "smart growth" type land use planning and policies.

The County should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction, as well as coordinate with Caltrans as development proceeds and funds become available to ensure that the capacity of on-/off-ramps is adequate.

Environmental

Caltrans appreciates the opportunity to comment on this Draft Program Environmental Impact Report (EIR) for the General Plan. The analysis presented may impact on Caltrans R/W in the future.

Should future projects based upon the changes enacted from the Program EIR have elements and/or mitigation measures change to effect Caltrans R/W, Caltrans would welcome the opportunity to be a Responsible Agency under the California Environmental Quality Act (CEQA) and to the continued coordination of our efforts.

Right-of-Way

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.

- Any work performed within Caltrans R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or by visiting the website at http://www.dot.ca.gov/trafficops/ep/index.html. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions, please contact Kimberly Dodson, of the Caltrans Development Review Branch, at (619) 985-1587 or by e-mail sent to Kimberly.Dodson@dot.ca.gov.

Sincerely,

electronically signed by

MAURICE EATON, Branch Chief
Local Development and Intergovernmental Review

From:	Pascual, Elena
To:	CAP
Cc:	Hansen, Mike; Vonblum, Heidi; Malone, Rebecca; Ash-Reynolds, Tara; Stephens, Mark
Subject:	City of San Diego Comment Letter on the Notice of Preparation of a Draft Supplemental Environmental Impact Report for the Climate Action Plan Update
Date:	Thursday, February 4, 2021 2:53:56 PM
Attachments:	Final City of San Diego Comment Letter on the NOP for the Climate Action Plan Update Draft SEIR.pdf

Dear Ms. Bray:

Thank you for the opportunity to review the Notice of Preparation of a Draft Supplemental Environmental Impact Report for the County of San Diego Climate Action Plan Update. Please see the attached City of San Diego comment letter on the Notice of Preparation.

Thank you,

Elena

Elena Pascual
Environmental Planner
City of San Diego
Planning Department

T: 619-533-5928
EPascual@sandiego.gov

The City of SAN DIEGO

Planning Department

February 4, 2021

County of San Diego
Planning & Development Services
Attn: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: **CITY OF SAN DIEGO COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT FOR THE COUNTY OF SAN DIEGO CLIMATE ACTION PLAN UPDATE (ENV. REVIEW NUMBER PDS2020-ER-20-00-002)**

Dear Ms. Bray:

The City of San Diego (City) Planning Department has received the Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report (EIR) prepared by the County of San Diego (County) and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the NOP and appreciates this opportunity to provide comments to the County.

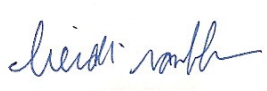
The effects of climate change have major regionwide implications and will require a comprehensive effort from multiple stakeholders to identify climate change vulnerabilities and provide resiliency and adaptation strategies. Measures such as reducing vehicle miles traveled, converting fleets and equipment to electric, expanding renewable energy sources, increasing solid waste diversion, and innovative carbon sequestration methods should be evaluated in the Supplemental EIR and potentially positive and complementary co-benefits of such methods should also be considered.

The City is in the process of updating its Climate Action Plan and is developing Climate Resilient SD, a comprehensive climate adaptation and resiliency plan which will increase the City's capacity to adapt, recover, and thrive in a changing climate. Continued coordination between the City, the County, and other local, regional, state, and federal agencies will be essential as the County updates its Climate Action Plan to ensure that the City and County's efforts align with and complement each other.

Thank you for the opportunity to provide comments on the NOP. Please contact myself, or Rebecca Malone, Senior Planner, at RMalone@sandiego.gov or 619-446-5371 directly if you

would like additional information regarding the City's efforts that could inform and benefit the County's efforts. We look forward to continued coordination as the County develops its Climate Action Plan.

Sincerely,



Heidi Vonblum, Deputy Director
Planning Department

RM/ep/tar

cc: Reviewing Departments (via email)
Review and Comment online file

From:	Turner, Jennifer@Wildlife
To:	CAP
Subject:	Comments on the County of San Diego"s Climate Action
Date:	Thursday, February 4, 2021 8:17:40 PM
Attachments:	County_of_San_Diego_Climate_Action_Plan_Update_NOP_Comments_CDFW.pdf

Hello,

I'm unclear if a copy of our letter made it into your inbox, so at the risk of being redundant, please see attached for the Department's comments.

Sincerely,
Jennifer Turner
California Dept of Fish and Wildlife

DocuSign Envelope ID: C0B89954-81CA-4B94-B1B6-DB3513690E00

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Rd.
San Diego, CA 92123
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director

February 4, 2021

County of San Diego Planning & Development Services
Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123
CAP@sdcounty.ca.gov

Dear Ms. Bray:

County of San Diego Climate Action Plan Update (PROJECT)
NOTICE OF PREPARATION (NOP) OF A DRAFT SUPPLEMENTAL ENVIRONMENTAL IMPACT REPORT (SEIR)
SCH# 2020120204

The California Department of Fish and Wildlife (CDFW) received a Notice of Preparation (NOP) of a Draft Supplemental Environmental Impact Report (SEIR) from the County of San Diego (County) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the state. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The County participates in the NCCP program through implementation of its approved Multiple Species Conservation Program (MSCP) Subarea Plan for southwestern San Diego County (South County MSCP (SC MSCP)), and development of its draft North and East County Subarea Plans (NC MSCP and EC MSCP).

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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PROJECT DESCRIPTION SUMMARY

Proponent: County of San Diego

Project Description/Objective: The overall objective of the County's Climate Action Plan (CAP) is to reduce Greenhouse Gas (GHG) emissions generated from activities within the unincorporated County (community) and GHG emissions generated by County facilities and operational activities throughout the County, including facilities and operations located within incorporated cities (County operations) to meet or exceed GHG reduction goals under State laws.

The CAP was adopted and the Final 2018 CAP SEIR was certified by the County Board of Supervisors on February 14, 2018. The 2018 CAP was adopted to comply with the County's 2011 General Plan Conservation and Open Space (COS) Goal COS-20, Policy COS-20.1, and 2011 General Plan Update Program Environmental Impact Report (2011 GPU PEIR) Mitigation Measures CC-1.2, CC-1.7, and CC-1.8. The General Plan Goal COS-20 requires reduction of community and County operations greenhouse gas emissions and Policy COS-20.1 requires preparation, maintenance, and implementation of a CAP. The 2018 CAP required a General Plan Amendment (GPA) to update COS-20 and COS-20.1 to comply with existing State law. The 2018 CAP SEIR project included the 2018 CAP, the associated GPA to the County's 2011 General Plan, and revision to the associated Mitigation Monitoring and Reporting Program, a threshold of significance for greenhouse gases (GHGs), and revised County Guidelines for Determining Significance for Climate Change.

CDFW provided comments on the November 2016 NOP for the draft SEIR in a letter dated November 21, 2016. To facilitate the adoption of CEQA significance thresholds and to facilitate project tiering, CDFW recommended that the SEIR establish a checklist of considerations for evaluating future projects and their potential to affect GHG emissions, or be affected by GHG emissions, in a manner that results in impacts to natural resources. Acknowledging that the field of climate science continues to evolve, CDFW encouraged the County to acknowledge the evolution by continuously updating the SEIR with the best available science. In the November 21, 2016 letter, CDFW provided a preliminary checklist with a sampling of recommendations that encouraged the County to include in their SEIR's final checklist with the intention that the checklist would evolve with the SEIR over time.

On December 24, 2018, the San Diego Superior Court ruled that the 2018 CAP approval did not comply with CEQA. The Superior Court ordered the County to set aside and vacate the February 14, 2018 approvals and the certification of the 2018 CAP SEIR. This decision was later affirmed in part by the California Court of Appeal, Fourth Appellate District (Appellate Court), on June 12, 2020 (Golden Door Properties, LLC, v. County of San Diego, 50 Cal. App. 5th 467). As a result, the County Board of Supervisors rescinded the 2018 CAP and 2018 CAP SEIR, and associated approvals, on September 30, 2020.

In addition to requiring rescission of the 2018 CAP and related approvals, the Superior Court ordered the County to submit an estimated schedule to prepare a new CAP and Guidelines for Determining Significance for Climate Change ("Guidelines"), and to comply with CEQA and the State Planning and Zoning Law. The Superior Court has retained jurisdiction to determine compliance. In response to the court's decision, the County will prepare a CAP Update, Guidelines, and SEIR to address the court's opinion.

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The draft SEIR will function as a supplement to the 2011 GPU Programmatic EIR (PEIR). The document will address whether the CAP, GPA, Guidelines, and GHG threshold would result in any new or substantially more severe environmental impacts than those previously evaluated in the certified 2011 GPU PEIR. The draft SEIR will identify a range of potential effects resulting from implementation of the project. The draft SEIR will also identify mitigation measures to reduce potentially significant effects, as needed.

The Draft EIR functions as a PEIR under CEQA Guidelines Section 15168(c) for streamlining future projects. The CAP is intended to be used for future project-specific GHG emissions analyses by being prepared consistent with the tiering and streamlining provisions of Section 15183.5 of the CEQA Guidelines. The Draft SEIR is intended to provide the appropriate level of environmental review to allow future projects to tier from and streamline their analysis of GHG emissions pursuant to CEQA Guidelines Section 15183.5(a) and (b)(2). Consistent with CEQA Guidelines 15168, because the SEIR does not provide project-level review of any specific development projects within the County, subsequent activities in the County that involve individual projects must be examined considering the SEIR to determine whether any additional environmental review is necessary.

Timeline: December 2020 Draft SEIR circulation and public review was extended from an end date of January 22, 2021 to February 4, 2021.

Location: The County of San Diego is located in the southwestern corner of the California. The County is bordered by the Pacific Ocean to the west, Orange County at the northwest corner and Riverside County to the north, Imperial County to the east, and the U.S. International Border with Mexico to the south.

The planning area for the CAP is the same planning area considered for the 2011 General Plan, which encompasses all unincorporated land in the County of San Diego. The unincorporated County is composed of 3,570 square miles and represents 84 percent of the total land area in the County.

Biological Setting: Vegetation communities and habitats within the County, as described in the 2011 GPU PEIR, include the following: chaparral, coastal sage scrub, coniferous forests, desert chaparral, desert dunes, desert scrub, dry wash woodlands, grasslands, marshes, meadows and seeps, oak forest, other woodlands, pinyon juniper woodland, playas/badlands/mudhill forbs, riparian forest, riparian scrub, riparian woodland, southern foredunes, beach, saltpan, mudflats, urban, disturbed habitat, agriculture, *Eucalyptus* woodland, and water. A total of 115 special-status animal species and 214 special-status plant species are currently listed as potentially occurring within the boundaries of the County.

CDFW's primary concerns with respect to climate change in San Diego County are the effects on biodiversity, special status plant and wildlife species, natural vegetation communities, and connections which maintain viable movement corridors between blocks of conserved habitat. Because climate change may impact species directly or indirectly by altering the distribution of vegetation types, promoting non-native species, duration and severity of drought, and increased frequency or magnitude of fires, CDFW considers the use of regional scale, multiple species conservation plans to be a valuable tool to guard against the effects of climate change.

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COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the Lead Agency in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources. Based on the potential for the Project to have a significant impact on biological resources, CDFW agrees that a SEIR is appropriate for the Project. CDFW makes the following comments and recommendations for review of projects tiering from the SEIR and analysis of potential impacts to biological resources. Proposed projects should consider climate variability and change, as well as species' adaptations throughout all phases of the project (i.e., initial project design though operations and maintenance). We encourage the County to incorporate these recommendations into the SEIR's final checklist.

1. CDFW strongly encourages and supports the County's efforts to complete both the NC and EC MSCP planning efforts. The regional conservation and management of large blocks of natural habitat will consequently provide protection to a broad suite of species. The modeling effort associated with this planning, which targets conservation of special status species, will further protect the most important remaining populations of such species, and ensure the means for movement between conserved areas. The NC and EC MSCP efforts are further expected to account for changes in the distribution of vegetation communities over time in response to a changing climate. This allows species to change in distribution along with their requisite habitat. In the absence of approved NC or EC MSCP plans, interim policies identified in the associated Planning Agreement, which is presently on track for renewal, should be used to guide review of development projects. As individual development projects are brought forward for County review, the County should continue to analyze these proposals using their 'Guidelines for Determining Significance – Biological Resources' and ensure that impacts are avoided, minimized, or appropriately mitigated. To this end, CDFW recommends that the SEIR reference the intention to be consistent with the County's adopted MSCP, and when renewed and applicable, the Planning Agreement (PA) for the NC and EC MSCP (including interim policies).

2. Planning for transportation projects should incorporate wildlife passage into early design. Transportation retrofit projects should be supported where feasible. Road designs should incorporate bridges or large culverts as well as smaller-scale design features and directional fencing to facilitate safe movement for both large and small animal species. Specific information to improve wildlife corridor usage has been developed by the U.S. Geological Survey (USGS), San Diego Management and Monitoring Program, and others through funding provided under San Diego Association of Governments (SANDAG) Transnet Environmental Mitigation Program. Project design should further consider information in wildlife corridor databases found in existing approved NCCP plans, and draft plans including the NC MSCP. The San Diego Management and Monitoring Program also has considerable local information in this regard.

3. Species occurrence data, road mortality data, linkage designs, and adjacent suitable habitat should inform the CEQA analysis, specifically regarding potential for impacts and the development of mitigation measures to improve or enhance wildlife movement impacted by projects tiering off the SEIR. In weighing the impacts of such projects on wildlife movement, beyond regional wildlife "corridors", analysis should address other common movement patterns. Projected climate-driven faunal movement routes and changes to existing vegetation types over time should be considered. Food sources, water sources, migration routes, and breeding and sheltering areas that may be disconnected as a result of climate projects should be considered when developing mitigation concepts.

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4. Review of future proposed large-scale wind or solar projects should consider potential harmful impacts to birds and bats that might result from a variety of causes, such as: injury and mortality from collision with wind turbines, solar panels or mirrors, guy wires, and fencing. The potential effects of project features such as roadways and fences on predator avoidance should be analyzed. Project plans should incorporate established standards for setbacks, height restrictions to minimize impacts to avian and bat species in locations in proximity to sensitive habitat lands including wildlife concentration points. Projects should consider strategies for deterrence of birds and bats from the area, such as anti-perching mechanisms, sound deterrents, and modification of night lighting to be less attractive to insects and thus foraging birds and bats. Proposed wind projects should consider the California Energy Commission and CDFW's "California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development".[2]

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDB at the following email address: CNDDB@wildlife.ca.gov. The types of information reported to CNDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW appreciates the opportunity to comment on the NOP of a SEIR to assist the County in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Meredith Osborne, environmental scientist at (858) 636-3163 or Meredith.Osborne@wildlife.ca.gov.

[2] California Energy Commission and California Department of Fish and Game. 2007. California Guidelines for Reducing Impacts to Birds and Bats from Wind Energy Development. Commission Final Report. California Energy Commission, Renewables Committee, and Energy Facilities Siting Division, and California Department of Fish and Game, Resources Management and Policy Division. CEC-700-2007-008-CMF

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Sincerely,

DocuSigned by:
David Mayer
D700B4520375406...

David A. Mayer
Environmental Program Manager
South Coast Region

ec: CDFW
Karen Drewe, San Diego – Karen.Drewe@wildlife.ca.gov
Kelly Fisher, San Diego – Kelly.Fisher@wildlife.ca.gov
Jennifer Ludovissy, San Diego - Jennifer.Ludovissy@Wildlife.ca.gov
CEQA Program Coordinator, Sacramento – CEQACommentLetters@wildlife.ca.gov
State Clearinghouse, Sacramento – State.Clearinghouse@opr.ca.gov
Jonathan Snyder, USFWS – Jonathan_Snyder@fws.gov

From: Chris Jacobs
To: CAP
Subject: CCA Implementing Ordinance
Date: Thursday, January 28, 2021 12:05:09 PM
Attachments: image001.png

Greetings,

Would you be so kind as to share your CCA implementing ordinance, approved on 1-29-19 (per 2019 annual CAP monitoring report).

Thanks!

Chris Jacobs
Principal Planner
City of Santee
10601 Magnolia Avenue
Santee, CA 92071
619-258-4100, ext 182
cjacobs@cityofsanteeca.gov



From: CAP
To: Chris Jacobs
Subject: RE: CCA Implementing Ordinance
Date: Monday, February 8, 2021 10:46:51 AM
Attachments: image001.png

Hello Chris,

My name is Tyler Farmer. I am a Planning Manager for the Sustainability Team, which is within the Planning & Development Services department.

I believe you are referring to the ordinance that was approved on October 29, 2019. On this date, the County's Board of Supervisors adopted an ordinance electing to implement a Community Choice Aggregation Program. You can find the details of this action at the following location under item #27.

- https://www.sandiegocounty.gov/content/sdc/cob/bosa/bos-calendar-meetings.html?date=10/29/2019&meetingtype=BOARD%20OF%20SUPERVISORS

If the link does not work or if you have any additional questions, please let us know.

Thank you, Chris.

From: Chris Jacobs <CJacobs@CityofSanteeCa.gov>
Sent: Thursday, January 28, 2021 12:05 PM
To: CAP <CAP@sdcounty.ca.gov>
Subject: CCA Implementing Ordinance

Greetings,

Would you be so kind as to share your CCA implementing ordinance, approved on 1-29-19 (per 2019 annual CAP monitoring report).

Thanks!

Chris Jacobs
Principal Planner
City of Santee
10601 Magnolia Avenue
Santee, CA 92071
619-258-4100, ext 182
cjacobs@cityofsanteeca.gov

Santee
DO MORE ▸ DUE EAST
City of Santee
10601 Magnolia Ave.
Santee, CA 92071
CityofSanteeCA.gov

From: Frank Ohrmund
To: CAP
Cc: Hannah Gbeh
Subject: Comments to consider and questions
Date: Thursday, December 10, 2020 10:56:51 AM

Please limit evaluation of net carbon impact to the unincorporated portions of San Diego County for analysis. Each City within San Diego County needs to evaluate separately so projects in the County can be evaluated independently.

San Diego County Farm Bureau would like to have their production of crops, groves and container plants be evaluated for carbon reduction and credits as their activities are not required and is a choice that should not be part of any baseline studies. The Farm Bureau can be a simple one stop shop for obtaining credits through an approved Protocol Program.

The San Diego County Farm Bureau desires a seat at the table for major stakeholders.

Thanks for your consideration of these items as you develop the CAP.

Frank Ohrmund, Land Use Committee Member SDCFB
2433 Fenton Street, Suite A
Chula Vista, CA 91914
619-397-5300 office
619-397-5370 fax
858-945-4974 cell

From: Mike Palat
To: CAP
Subject: Climate Action Plan Input
Date: Wednesday, December 23, 2020 2:25:18 PM
Attachments: Urban Tree Policy.docx

Hello there,

My name is Michael Palat and I am the Chairman of the San Diego Regional Urban Forests Council. I noticed that you are seeking input on the counties Climate Action Plan. I am deeply involved in the county's management of its urban forests both as a tree maintenance contractor for all of the cities in the county and also the public works department of San Diego County. With that said, I have been working with several cities, counties and other public agencies involved with climate action planning. We have been working with them to consider adopting an Urban Tree Policy with consideration of salvaging the wood carbon for reutilization. The attached urban tree policy document has been vetted and approved by CALFIRE as a good program for agencies to consider adopting. The City of Carlsbad recently adopted a version of it. Additionally, the City of Vista, San Diego, Chula Vista, Santee and La Mesa are also in early adoption phase. This is a great supplement to any and all climate action plans.

There are multiple urban wood recycling programs that are out there currently salvaging the urban wood. These include: www.streettreerevival.com and www.lumbercycle.org to name a few. Also, of note locally is an initiative locally where Taylor Guitars is using urban trees to make guitars. The story was featured in Rolling Stone Magazine. https://www.rollingstone.com/pro/features/taylor-guitars-highway-trees-989888/

I am happy to discuss this further with any stake holders that are out there.

Michael Palat
Chairman
San Diego Regional Urban Forests Council

And…
Vice President
West Coast Arborists, Inc.
ISA Board Certified Master Arborist
ISA Utility and Municipal Specialist 6541BCMA-U/M
Tree Risk Assessment Qualified
714 920 4366 Mobile
858 566 4204 Office

Appendix C

Sample Urban Tree Recycling Policy

This is a suggested template that may be utilized or edited based on your community's needs. This suggested template has been endorsed by the California Department of Forestry and Fire Protection Urban and Community Forestry Program.

This policy supports the City of _____'s Sustainability Plan, Climate Action Plan, and/or Urban Forest Management Plan to ensure the sustainability of the urban forest. The goal is to optimize ecosystem services, including greenhouse gas reduction, and to utilize trees that must be removed in the most efficient way possible.

Such removed trees shall be used for the highest and best use possible. Environmental benefits are realized by diverting wood that would otherwise populate landfills and produce greenhouse gas emissions which are released through traditional disposal processes. Co-benefits include sourcing local raw materials for construction, maximizing benefit from trees being removed, and displaying urban wood products in the community. This tells the story of the City in which the trees matured and added to the community character. With this policy adoption, the City of _____ will be at the forefront in the nationwide effort to certify urban wood usage within City projects.

Tree Removal Utilization Plan.

- Any trees that are removed for reasons such as failure, disease, or decline or other reasons stated within the City of _____'s management plan are subject to be repurposed for their highest use. This includes, but is not limited to, being milled into lumber, left in public spaces as natural architecture including wildlife habitat or crafted into usable products such as benches, picnic tables, new construction elements and / or other wood crafts/projects.

- Suggested resources for wood processing can be found at urbansalvagedwoods.com, urbanwoodnetworkwest.org, usrwcertified.org, & urbanwoodnetwork.org.

- The selection criteria for urban wood shall be made at the discretion of the city arborist or other designated city representative using current industry standards.

- Should wood not be eligible for repurposing into product, trees may be mulched or converted into other biomass products for use in the community.

Desirable Species Replacement Plan.

- Tree replacement criteria should include consideration of the full suite of benefits that may be provided throughout the life of the tree, including a consideration for end of life uses, such as high quality lumber.

- It is recommended that these replacement species be selected in collaboration with local experts based upon the unique region and climate.

- Species information may be found at https://selectree.calpoly.edu/about: SelecTree is a Tree Selection Guide. Should consultation be needed for suitable species, West Coast Arborists, Inc. may be utilized as a resource.

Urban Wood Utilization in New or Modified Public Construction Projects Plan.

- Use of the USRW North American Standards for Certification and Chain of Custody for Urban, Salvaged and Reclaimed Woods as set by USRW Certified Woods and endorsed by the Urban Wood Network is recommended to ensure quality. https://usrwcertified.org/

- Urban wood should be considered in all city projects. To gain the maximized benefits of repurposed lumber from city trees, it is recommended that any new or modified public construction development that takes place within the city limits should include an urban wood element that is at a minimum cost of 1% of the overall project. This 1% is not in addition to project budget but can be included in items that would be necessary despite urban wood policy (i.e. locally sourced urban wood table vs harvested lumber table).

- This measure assures that the market for the City of _____'s urban wood is local (local being defined as within 500 miles or less per USRW certification, with lesser distance traveled preferred) and sustainable, maximizing the benefit of repurposed lumber from urban trees.

- It is suggested that urban wood utilization plans be approved by the City of _____'s planning department, if applicable.

    - When approval is required, all project scope details shall be in accordance with all municipal construction and / or building code standards.

- Other means of quantifying urban wood usage in public/private projects are acceptable, such as incentive programs for contractors.

***This document is a sample template**

From:	Peter Andersen
To:	CAP
Cc:	Terra Lawson-Remer; Nathan Fletcher
Subject:	CAP UPDATE SUPPLEMENTAL EIR
Date:	Saturday, January 23, 2021 11:33:01 AM
Attachments:	Sierra Club CAP Document_01-12-2021.docx

Dear County Staff,

Please find attached the CAP recommendations and Terms from Sierra Club San Diego for the upcoming scoping meeting on the EIR.

Dr. Peter Andersen
Sierra Club San Diego

SIERRA CLUB
SAN DIEGO CHAPTER

SIERRA CLUB –
COUNTY OF SAN DIEGO 2021 CLIMATE ACTION PLAN
January 12, 2021

I. Introduction

This document is to present a list of Sierra Club terms for the County of San Diego's upcoming revised Climate Action Plan.

First and foremost, the County must immediately declare a climate emergency. The County must also do more than just neutralize greenhouse gas emissions by seeking to achieve current standards of "net zero" emissions. Rather, the County should be working to greatly reduce GHG emissions below the 1990 baseline with net negative emissions to help reverse global climate destruction.

The document includes a number of other positions on how the County should reduce greenhouse gas emissions through County programs and public projects, commercial business and residential projects, and private residential projects. The document addresses findings of significance for projects undergoing CEQA review, calculations of GHG emissions that reflect the true life span of projects, and many possible measures to minimize or mitigate GHG emissions.

In particular, the County must emphasize reducing emissions in disadvantaged communities, locate GHG mitigation in the same disadvantaged communities in which emissions occur, and establish a GHG mitigation bank directly benefiting disadvantaged communities. Other GHG mitigation must occur entirely within the County. And existing multiple species conservation programs should be utilized to establish a natural habitat land mitigation bank for GHG emissions.

The following is a list of Sierra Club terms for the County's Climate Action Plan.

II. County Programs

a. Due to the serious nature of the climate crisis globally and locally, San Diego County should declare a climate emergency.

b. The County shall achieve net negative one hundred percent (100%) GHG emissions[1] by 2035.

c. The County shall implement the following measures to achieve net negative 100% GHG emissions by 2035:

    1. Establish a Community Choice Aggregation program to provide 100% renewable energy by 2035.

    2. Downzone lands in Calfire's high/highest fire risk areas and highest vehicle miles (VMT) travelled areas of the county.

    3. Bar General Plan amendments for increased commercial or residential development in Calfire's high/highest fire risk areas and highest vehicle miles (VMT) travelled areas of the county.

    4. Purchase Fanita Ranch, Harvest Hills, Lilac Hills, Newland Sierra, Otay Ranch Village 13, Otay Ranch Village 14/16/19, and Rancho Guejito to avoid conversion to development and/or as a natural habitat lands GHG mitigation bank.

    5. Establish a program to recycle 100% of all organic waste.

d. The County should implement the following additional measures to achieve net negative 100% GHG emissions by 2035:

    1. Convert natural gas or propane utilities to electric at County facilities.

    2. Install photovoltaic solar panels, wind turbines, and/or other onsite renewable energy and batteries at County facilities.

    3. Install electric heat pumps to provide air and water heating and cooling at County facilities.

[1] The term "net negative 100% GHG emissions" is intended to articulate a stronger goal for GHG emission reductions than is currently practiced by the County. The term "net negative 100% GHG emissions" is equivalent to a 2:1 mitigation ratio and originates from the County's term "net zero GHG emissions" (i.e. 1:1 mitigation) that is commonly cited as a goal or requirement in the current County CAP and CEQA documents. The Sierra Club's stronger term means that the sum of GHG emissions from any County activity should not just be neutral (i.e. "net zero"), they should actually be reduced by at least 100% from baseline (i.e. "net negative 100%" or 2:1 minimization and mitigation). For comparison, development projects impacting wetlands are required under the County's Resource Protection Ordiance to mitigate impacts at a 3:1 ratio (i.e. net negative 200%).

4. Install improved weatherization and insulation at County facilities.
5. Install graywater systems at County facilities.
6. Convert county vehicle fleets to electric vehicles and plug-in hybrid electric vehicles.
7. Provide dividend account parking for all County employees.
8. Increase diversion of solid waste and capture landfill methane.
9. Prohibit all gas-powered leaf blowers.
10. Plant and maintain trees. Priority should be given to native trees when possible.
11. Collaborate with SANDAG to support and implement the Five Big Moves.
12. Support short term extension of mass transit prior to implementation of the Five Big Moves.
13. Support construction of bicycle trails and protected lanes for bikes and scooters.
14. Support installation of public electrical vehicle charging stations.
15. Support construction of pedestrian overpasses and other pedestrian infrastructure.
16. Support establishment of a local natural habitat lands GHG mitigation bank with avoided conversion to development and conservation management in perpetuity of habitat land inside or bordering existing or planned regional multiple species conservation plan preserves (e.g. City of San Diego Multiple Habitats Planning Area or County of San Diego Pre-Approved Mitigation Area) or the Cleveland National Forest inholdings.
17. Support establishment of a local disadvantaged communities GHG mitigation bank with replacement of commercial or personal GHG-emitting vehicles and equipment with electric vehicles and equipment, commercial or residential electrification, and other energy efficiency improvements to businesses or residences

e. The County should provide incentives and subsidies to existing businesses and residences for the following measures to achieve net negative 100% GHG emissions by 2035.

1. Conversion of natural gas or propane utilities to electric.

2. Installation of photovoltaic solar panels and/or other onsite renewable energy and batteries.

3. Installation of electric heat pumps to provide air and water heating and cooling.

4. Installation of improved weatherization and insulation.

5. Installation of graywater systems.

6. Planting and maintaining trees.

7. Free mass transit passes to students and residents of disadvantaged communities.

8. Carpooling.

9. Purchase of electric vehicles.

10. Free parking for electric vehicles

11. Capture methane from agricultural facilities.

12. Avoided conversion to development of agricultural cropland.

13. Production and distribution of locally grown produce and foods.

III. Regulation of GHG Emissions from Public & Private Commercial Development

The County shall implement the following measures to achieve net negative 100% GHG emissions from new public projects and private commercial developments[2] (developments) by 2035:

a. **CEQA Significance –** Public projects and private commercial developments' GHG emissions shall be considered "significant" under CEQA for any public project and any commercial development project exceeding [THRESHHOLDS TBD].

b. **CEQA Overriding Considerations –** CEQA findings of overriding considerations shall not be provided for public projects and private commercial developments with significant GHG emissions/impacts.

[2] Private commercial developments include commercial business and residential development developments.

c. **GHG Emissions Threshhold –** Public projects and private commercial developments shall achieve net negative 100% GHG emissions through onsite minimization and offsite mitigation.

d. **Developments' GHG Emissions Lifespans –** Public projects and private commercial developments' life spans shall be a minimium of 100 years for calculation of: a) GHG emissions; b) onsite project design to minimize GHG emissions; and c) any offsite mitigation.

e. **Minimization of GHG Emissions –** Public projects and private commercial developments shall minimize onsite GHG emissions by incorporating climate-friendly and environmental design to the maximum extent feasible with the minimum following conditions:

    1. Developments shall be electric and prohibit plumbing for natural gas.

    2. Developments shall include photovoltaic solar panels and/or other onsite renewable energy and onsite batteries to provide 100 percent of any project's annual electricity needs.

    3. Developments shall include electric vehicle charging stations to serve all projected project-related vehicles.

    4. Developments shall include electric heat pumps to provide one hundred percent of air and water heating and cooling.

    5. Developments shall prohibit vehicle idling.

    6. Developments shall include graywater systems.

    7. Developments shall minimize water consumption.

    8. Developments shall include shade trees.

    9. Developments shall provide transit passes to residents.

f. **Mitigation of GHG Emissions –** To the extent that onsite minimization of any public or private commercial development project's GHG emissions to net negative 100% is not feasible, offsite GHG mitigation shall be provided to achieve net negative 100% GHG emissions that is in addition to any existing laws, regulations, or plans already compelling reductions in GHG emissions.

1. Developments' GHG offsite mitigation shall be entirely within San Diego County.

2. Developments' GHG offsite mitigation shall be entirely within the same disadvantaged communities[3] as emissions.

3. Offsite GHG mitigation may include any of the following:

    a) Preservation of natural habitat land inside or bordering existing or planned regional multiple species conservation plan preserves (e.g. City of San Diego Multiple Habitats Planning Area or County of San Diego Pre-Approved Mitigation Area) or private holdings within Cleveland National Forest. Preservation of natural habitat land as GHG mitigation shall include private property acquisition and conservation stewardship management in perpetuity. The amount of GHG mitigation provided by preservation of natural habitat land shall be determined by calculating reduced GHG emissions on the property over one hundred years resulting from avoided conversion to development of the number of existing legally entitled or zoned units and/or square feet on the preserved property.

    b) Direct replacement of GHG-emitting vehicles and equipment (e.g. diesel generators) with electric vehicles and electric equipment including at any site under the jurisdictional authority of the Port of San Diego (including cargo and cruise ship terminals), of the Metropolitan Transit System, of the North County Transit District, and of the San Diego Airport Authority.

    c) Create environmental justice grant programs in disadvantaged communities for direct replacement of commercial or personal GHG-emitting vehicles and equipment with electric vehicles and equipment, commercial or residential electrification, and other energy efficiency improvements to businesses or residences.

    d) Direct reductions in water consumption.

IV. Regulation of GHG Emissions from Personal Residential Development

The County shall implement the following measures to minimize GHG emissions from new private residential development projects:

[3] California Offive of Environmental Health Hazard Assessment CalEnviroScreen https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30

a. Personal residential remodelling and addition projects shall achieve net zero GHG emissions through onsite minimization with incorporation of climate-friendly and environmental design with the following conditions:

1. All Projects shall be electric and prohibit plumbing for natural gas.

2. Projects shall include electric heat pumps to provide one hundred percent of air and water heating and cooling.

3. Projects shall minimize water consumption.

4. Projects should include photovoltaic solar panels and/or other onsite renewable energy and onsite batteries.

5. Projects should include electric vehicle charging stations to serve all projected project-related vehicles.

6. Projects should include graywater systems.

7. Projects should include tree planting.

###

From: Austin Jones
To: CAP
Subject: SD County Climate Action Plan (CAP) Greenhouse Gas Reduction
Date: Monday, January 25, 2021 2:52:24 PM

Good afternoon,

My name is Austin Jones and I am a resident of San Diego County (specifically Alpine). I receive the regular County of San Diego Planning & Development Services email updates.

In the most recent email with the subject "Notice of Preparation Scoping Meeting Invite: CAP Update (Planning & Development Services)" there was a specific note that the county is seeking new strategies on how to reduce the greenhouse gas emissions within the county.

This immediately stuck out to me and I hope that I can find the right individual to speak with. We have produced a Concrete pavement product that eliminates over 50% of the greenhouse gas associated with traditionally produced and placed concrete products.

We do this through the use of less cement, better admixtures, and volume taken by air. In addition, we place the rock on its own without the cement meaning that heavy water and pre-mixed cement does not need to be transported to the job sites. After the rock is placed, the cement-based slurry is sprayed over the rock, soaks in and binds the entire section together into concrete.

If whoever receives this email would be willing to give me a call or put me in touch with the appropriate individual regarding how we could work together to help reduce greenhouse gas emissions associated with pavement and erosion control systems it would be greatly appreciated. I would appreciate the opportunity to help San Diego meets and exceed its goals outlined in our climate action plan.

Thank you in advance!

--

Austin Jones
ECOSCAPE PAVEMENT
AJones@EcoscapePavement.com
619-672-2011

1_Ecoscape.png

From:	Dan Silver
To:	CAP
Cc:	Talleh, Rami; Flannery, Kathleen; Aghassi, Sarah; Mills, Benjamin; Wier, Emily; Olascoaga, Rosa; Kazmer, Gregory; Shute, Madeline; Petterson, Cody; Andrade, Evlyn; Michael Beck
Subject:	Comments on NOP for County of San Diego Climate Action Plan Update (PDS2020-POD-20-016 and PDS2020-GPA-20-004, and PDS2020-ER-20-00-002)
Date:	Tuesday, January 26, 2021 10:23:53 AM
Attachments:	EHL-CAP Update NOP-1.26.21.pdf

January 26, 2021

County of San Diego
Planning & Development Services Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310 San Diego, CA 92123

Dear Ms Bray:

RE: Comments on NOP for County of San Diego Climate Action Plan Update (PDS2020-POD-20-016 and PDS2020-GPA-20-004, and PDS2020-ER-20-00-002)

Please see enclosed comments.

Yours truly,
Dan

Dan Silver, Executive Director
Endangered Habitats League
8424 Santa Monica Blvd., Suite A 592
Los Angeles, CA 90069-4267

213-804-2750
dsilverla@me.com
https://ehleague.org

ENDANGERED HABITATS LEAGUE
DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

January 26, 2021

County of San Diego
Planning & Development Services Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310 San Diego, CA 92123

Dear Ms Bray:

RE: Comments on NOP for County of San Diego Climate Action Plan Update (PDS2020-POD-20-016, PDS2020-GPA-20-004, PDS2020-ER-20-00-002)

Dear Ms. Bray:

For the updated Climate Action Plan (CAP), Endangered Habitats League is most interested in reducing emissions in the transportation sector. For this reason, we recommend developing one or more "smart growth" alternatives with *low vehicle miles traveled (VMT)*. Such alternatives would reduce long commutes to jobs and activity centers.

In these alternatives, intensification of uses beyond the current General Plan in high VMT locations would be effectively prohibited through criteria or other mechanisms. Current capacity in the current General Plan within high VMT locations would be selectively down-planned or limited through other planning mechanisms, and where possible, redirected to low VMT locations. Complementary financial incentives and disincentives, such as a substantial VMT mitigation fee, should also be developed to redirect development away from high VMT locations.

As wildfire is a contributor to GHG emissions, and fire ignitions occur at the urban-wildland interface (WUI), expansion of the WUI should also be restricted. In one or more of the "smart growth"/low VMT alternatives, development in high and very high fire hazard severity zones would be subject to the same measures (no intensification, selective down-planning, other planning mechanisms, incentives and disincentives). To a great extent, high fire and high VMT locations will coincide.

Native habitat and farmland sequester carbon, and their preservation contributes to climate goals. The alternatives described above will help spare natural and working lands. In addition, EHL urges the development of funding sources directed to acquisition and easements, such as the use of land protection as a *mitigation measure* for carbon emissions from new development. In lieu fees (e.g., VMT mitigation fee) and VMT mitigation banks are two options. The State of California Sustainable Agricultural Lands

Conservation (SALC) program provides an example that is already in use. Many co-benefits are associated with this approach.

Thank you for considering our views and we look forward to working with you on an updated CAP.

Yours truly,



Dan Silver
Executive Director

From:	Taiga.Takahashi@lw.com
To:	CAP
Subject:	Golden Door Comments on CAP Update, PDS2020-POD-20-016, PDS2020-GPA-20-004, PDS2020-ER-20-00-002
Date:	Wednesday, January 27, 2021 2:11:46 PM
Attachments:	Golden Door Farms Cmts on 2021 CAP - 1-17-2021.pdf

Good afternoon.

Please find attached comments from Golden Door Farms regarding the County's December 2020 Notice of Preparation of SEIR for the CAP Update.

Taiga Takahashi

LATHAM & WATKINS LLP
12670 High Bluff Drive
San Diego, CA 92130
Dial: +1.858.523.5400
Fax: +1.858.523.5450
Email: taiga.takahashi@lw.com
Bio: Attorney Profile
http://www.lw.com

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LATHAM & WATKINS LLP

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Los Angeles	Tokyo
Madrid	Washington, D.C.
Milan	

January 27, 2021

VIA EMAIL

County of San Diego
Planning & Development Services
Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Email: CAP@sdcounty.ca.gov

Re: Comments on County of San Diego Climate Action Plan Update December 2020 Notice of Preparation of SEIR

We represent Golden Door Properties, LLC (or "Golden Door Farms"), a hospitality and agricultural business situated on approximately 600 acres on the south side of Deer Springs Road in northern San Diego County. Golden Door Farms is committed to environmental stewardship and sustainability and is proud that California is a leader in efforts to reduce greenhouse gas emissions to combat the important issue of the threat of climate change. Accordingly, Golden Door Farms offers the enclosed comments on the County of San Diego's Notice of Preparation for the Climate Action Plan Update, PDS2020-POD-20-016, PDS2020-GPA-20-004, and PDS2020-ER-20-00-002.

Thank you for your time and attention to our comments. Please do not hesitate to contact us should you have any questions or comments.

Best regards,

Taiga Takahashi
of LATHAM & WATKINS LLP

Enclosure

Golden Door's January 27, 2021 Feedback on Framework for County's 2021 Climate Action Plan (CAP)

During the course of our prior CAP litigation with the County, Golden Door identified the following problems that must be resolved to develop a workable and legally defensible program

1. **Problem: The CAP is required as mitigation for the climate change impacts of the 2011 General Plan. The original mitigation measure (CC-1.2) for the 2011 General Plan may not be substantially changed without re-evaluating impacts of the 2011 General Plan.**

    a. **Solution: Any** CAP must comply with the text and spirit of the original General Plan Mitigation Measure CC-1.2 and CEQA. The new CAP and related approvals (e.g., significance threshold) (collectively, the "CAP") must include, at least, an updated baseline inventory of GHG emissions from all sources, reconciliation with other GHG inventories in San Diego County disregarded in prior inventories (e.g., SANDAG's RTP/SCS GHG emissions inventories and forecasts), detailed GHG emissions reduction targets and deadlines, and comprehensive and enforceable GHG emission reduction measures for the reduction of community emissions.

2. **Problem: The defective 2018 CAP improperly veered from and went beyond its mandated objective to mitigate the climate change impacts of the 2011 General Plan; for example, the loose and unenforceable GHG offsets program became a vehicle for expedited approval of all post-2018 General Plan Amendment projects in the County.**

    a. **Solution:**

        i. The CAP and its related approvals (e.g., threshold and checklist) should focus on mitigating impacts on the current General Plan, not providing a vehicle for shortcut analysis and expedited approval of every single possible change to the General Plan in the future.

        ii. Mitigation for future GPA projects should be addressed by limiting those GPA projects that increase density beyond General Plan requirements to either SANDAG-designated smart growth areas and/or census-designated places located wholly within the boundaries of an urbanized area, per SB 330.

3. **Problem: The CAP was supposed to have been developed nearly 10 years ago as part of mitigation for the 2011 General Plan. Yet meanwhile, the County continued to process large-scale GPA projects without having completed an effective and legally valid CAP, including approving large-scale GPA projects that used the same mitigation strategies that multiple courts ultimately found violated CEQA. Even after the County approved the 2018 CAP, the County asserted in court, contrary to the text of the CAP approvals themselves, that in-process projects considered after the approval of the CAP were not necessarily required to comply with the CAP.**

    a. **Solution:** The County should suspend further processing of large-scale GPA projects (500 units or greater) until it completes an effective and legally valid CAP; all in-process GPA projects considered for approval after the new CAP's adoption must be required to comply with the CAP. Any argument that a CAP cannot be applied because no CAP was applied in the last 10 years is unsustainable.

4. **Problem: The defective 2018 CAP relied too heavily on carbon offsets, and such offsets were unverifiable, unenforceable, and otherwise violated the law (e.g., the General Plan's requirement for the reduction of "community emissions").**

    a. **Solution:**

        i. Use of offsets should be minimized and should be allowed only when all feasible, on-site reduction measures are exhausted or found to be infeasible based on substantial evidence.

        ii. Offsets should be a limited component of any project's GHG mitigation efforts, like in the State Cap-and-Trade system or the Newhall Ranch GHG mitigation plan.

        iii. Offsets should be local (i.e., within the County), with priority/preference for offset projects within the vicinity of the project, and they should be verifiable and enforceable by the County and comply with all applicable laws (for example, the General Plan, which requires a

reduction in the County's "community emissions").

iv. The approval of specific offset projects should be subject to public notice and comment.

v. The public should be allowed to monitor the issuance, transfer, and retirement process of offsets to confirm compliance against defined and legally adequate performance standards.

vi. The use of offsets as proxy mitigation for VMTs must be evaluated for its impact on regional plans (e.g., SANDAG RTP/SCS), as well as state and General Plan goals/targets.

vii. Offsets should be required for a sufficient duration, i.e., longer than 30 years. Impacts from residential development projects do not cease to exist after 30 years. The South Coast AQMD 30-year project life applies to equipment and facilities with a useful life that must be replaced or re-permitted (and subject to mitigation) or cease operating after 30 years, and so it is not broadly applicable, especially not to all residential development projects.

viii. The approval of non-local offsets in projects like Lake Jennings Marketplace and Sweetwater Place must be disclosed and incorporated into the CAP EIR's analysis.

5. Problem: The defective 2018 CAP did not have meaningful consideration and analysis of VMT and improperly assumed that generic GHG emissions were the same as VMT based on erroneous reasoning.

a. **Solution:**

i. Work meaningfully with SANDAG on the development of the CAP.

ii. Meaningful consideration and analysis of VMT reduction from new residential development as a separate GHG reduction measure, for example, through improved infrastructure for bicycles, car-sharing or car-pooling, shuttle services, transit subsidies, new public transit and/or access to existing transit, etc.

iii. Use the most recent model to analyze VMTs as required by SB 743 (currently, Series 14). Do not use outdated models.

iv. Good faith, in-depth evaluation of a smart growth alternative that focuses on areas identified by urban area transit boundaries on SANDAG's Smart Growth Concept Map.

v. Acknowledgement and robust discussion of co-benefits of local GHG reduction, particularly with respect to environmental justice. Do not dismiss the benefits of and the impacts of the loss of local GHG emissions reduction because "GHG emissions are a global phenomenon."

vi. Reasonable, evidence-based assumptions regarding the adoption of electric vehicles as a method of quantifying GHG emissions from VMTs.

6. **Problem: The defective 2018 CAP did not adequately evaluate energy impacts and environmental justice impacts and mitigation, especially with respect to the use of offsets.**

a. Solution:

i. If offset projects for new development are going to be sited near economically disadvantaged communities, those impacts must be disclosed and analyzed.

ii. CAP measures should be evaluated for these impacts and incorporate the required mitigation.

7. Problem: The County's 60-day document preservation/destruction policy with respect to CEQA project documentation has been found by the court to violate the law.

a. **Solution:**

i. The County must preserve all CAP-related emails and correspondence, including those with all internal and external stakeholders, members of the public, and consultants, and make it available to the public upon request under the California Public Records Act.

ii. The County should create and disclose a privilege log for all such public records that it anticipates withholding from the public.

From: Austin Jones
To: CAP
Subject: Re: SD County Climate Action Plan (CAP) Greenhouse Gas Reduction
Date: Tuesday, January 26, 2021 11:28:29 AM
Attachments: image001.png

Thank you for your quick response.

What I failed to mention is that our process is actually permeable as well with up to 1,200 inches per hour infiltration rate. Please visit our website to see examples of our installations. www.ecoscapepavement.com

We have recently completed a multi-faceted installation for the new County building in Oceanside if anyone would like to do a job walk.

Thank you in advance!

Austin Jones
619-672-2011
atjones74@gmail.com

On Tue, Jan 26, 2021 at 10:16 AM CAP <CAP@sdcounty.ca.gov> wrote:

> Hello,
>
> Thank you for your email and interest in the County of San Diego Climate Action Plan Update. This email is to confirm that your comment has been received and will be reviewed during the update process.
>
> You can continue to receive updates on the Climate Action Plan Update by visiting our website (https://www.sandiegocounty.gov/content/sdc/sustainability/cap.html) and signing up for email updates.
>
> Thank you again for your interest. Please let us know if you have additional questions or comments.
>
> Best,
>
> County of San Diego, Sustainability Team
>
> Planning & Development Services | Sustainability
>
> County of San Diego

5510 Overland Ave, Suite 310, San Diego, CA 92123

cap@sdcounty.ca.gov

Climate Action Plan Website

Sign up for Climate Action Plan email updates.

For local information and daily updates on COVID-19, please visit www.coronavirus-sd.com. To receive updates via text, send **COSD COVID19** to **468-311.**

Coronavirus Disease 2019
COVID-19

From: Austin Jones <ajones@ecoscapepavement.com>
Sent: Monday, January 25, 2021 2:52 PM
To: CAP <CAP@sdcounty.ca.gov>
Subject: SD County Climate Action Plan (CAP) Greenhouse Gas Reduction

Good afternoon,

My name is Austin Jones and I am a resident of San Diego County (specifically Alpine). I receive the regular County of San Diego Planning & Development Services email updates.

In the most recent email with the subject "Notice of Preparation Scoping Meeting Invite: CAP Update (Planning & Development Services)" there was a specific note that the county is seeking new strategies on how to reduce the greenhouse gas emissions within the county.

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We do this through the use of less cement, better admixtures, and volume taken by air. In addition, we place the rock on its own without the cement meaning that heavy water and pre-

mixed cement does not need to be transported to the job sites. After the rock is placed, the cement-based slurry is sprayed over the rock, soaks in and binds the entire section together into concrete.

If whoever receives this email would be willing to give me a call or put me in touch with the appropriate individual regarding how we could work together to help reduce greenhouse gas emissions associated with pavement and erosion control systems it would be greatly appreciated. I would appreciate the opportunity to help San Diego meets and exceed its goals outlined in our climate action plan.

Thank you in advance!

--

Austin Jones
ECOSCAPE PAVEMENT
AJones@EcoscapePavement.com
619-672-2011

--

Austin Jones
ECOSCAPE PAVEMENT
AJones@EcoscapePavement.com

1_Ecoscape.png

From: Jessica Babcock
To: CAP
Subject: FW: County of San Diego CAP
Date: Thursday, January 28, 2021 10:21:47 AM

From: Frank Ohrmund <frank@otayrealestate.com>
Sent: Monday, January 25, 2021 2:53 PM
To: Jessica Babcock <jessica.babcock@ascentenvironmental.com>
Subject: County of San Diego CAP

Hi Jessica,

As a member on the San Diego County Farm Bureau's Land Use Committee, we would like to have an opportunity to provide our focused input and to ask questions on the baseline data that is being used. We would also like to have access to the science personnel that are creating and using assumptions. Please confirm that this is a program that only looks at carbon absorption and generation in the unincorporated portions of San Diego County.

Thanks,

Frank Ohrmund, Owner/Broker
Otay Real Estate
2433 Fenton Street, Suite A
Chula Vista, CA 91914
619-397-5300 office
619-397-5370 fax
858-945-4974 cell

From:	XiMarie Chen
To:	CAP
Subject:	Comments for the Notice of Preparation document for Scoping meeting
Date:	Thursday, January 28, 2021 1:32:40 PM
Attachments:	San Diego County CAP & Smart Growth Letter - Scoping Meeting version.pdf

Hello Kelly,

Please submit the attached letter as a comment for the Scoping Meeting today, January 28, 2021.

Kind regards,

Marie Chen
Climate Policy Team Chair
The Climate Reality Project, San Diego Chapter



Think Green and Save Trees. Please only print if **absolutely** necessary. Thank you!

The Climate Reality Project
SAN DIEGO CHAPTER

January 28, 2021

County of San Diego
Planning & Development Services
Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Sent by e-delivery

Ref: Support for Adoption of an Aggressive Climate Action Plan to Achieve No New Greenhouse Gases in the County by 2035; to Reduce Such Gases Thereafter; and Adoption of a Smart Growth Program for the County

Honorable Supervisors:

Congratulations to the Board for adopting a goal of zero greenhouse gases (GHGs) by 2035; moving as soon as possible to decarbonize San Diego County; committing to adoption of a Sustainability Plan that will be a critical element in achieving the objectives of the Climate Action Plan; and stating an intent to initiate collaborative action with other jurisdictions within the County.

The San Diego Chapter of the Climate Reality Project (CRPSD) intends to actively participate in efforts to engage the community in preparation of the Draft Climate Action Plan (CAP), and in reviewing and commenting on the Draft once it has been released. Suffice it to say at this point that CRPSD supports the adoption of a CAP that is specific and enforceable and can achieve the goal of no new GHGs by 2035, and to reduce GHGs in the atmosphere after that date.

A study published by research scientists at UCSD in Nature Communications on January 14th of this year reports on potential ways of actually removing GHGs from our atmosphere.[1] The County should work with the San Diego Air Pollution Control District, which will shortly be reconstituted, the California Air Resources Board, and others in exploring the feasibility of this option.

In the new CAP, we urge the County to focus particularly on methods to reduce the so-called "super pollutants", such as hydrochlorofluorocarbons (HCFCs), perfluorocarbons (PFCs), and

[1] Hanna, Ryan, et al. "Emergency deployment of direct air capture as a response to the climate crisis." A Climate in Crisis Calls for Investment in Direct Air Capture, New Research Finds, Nature Communications, 14 January 2021, https://www.nature.com/articles/s41467-020-20437-0. Accessed 27 01 2021.

hydrofluorocarbons (HFCs), methane (CH_4), and black carbon (BC) that have particular potency. We note that Dr. Veerabhadran Ramanathan, Distinguished Professor of Climate and Atmospheric Sciences at Scripps Institution of Oceanography at UCSD is one of the leading experts on black carbon, and his expertise, as well as others at the University, may be very useful in developing the CAP.

Diesel combustion is a major source of black carbon. Although Governor Newsom's Executive Order (N-79-20) does not call for the elimination of diesel combustion in California until 2045, the Bay Area has committed to going diesel-free by 2033. San Diego County should pursue a similar course.

Converting sustainable and sustainably produced biofuels to energy could reduce a massive amount of very potent GHGs and could be used in a variety of forms of transportation.

In addition to preparing a legally adequate, enforceable, and comprehensive CAP, the County is required to analyze a smart-growth alternative in the Environmental Impact Report (EIR) on this action. This is extremely important because, in the past, the County has repeatedly approved amendments to the General Plan in order to allow sprawl projects that result in a tremendous increase in GHGs and increase the likelihood of wildfires. Numerous sources have reported that the emissions from wildfires in California have offset all the reductions of GHGs achieved by the State. For example, one report states that "The 2018 wildfires in California are estimated to have produced more than nine times greater emissions than were reduced across the entire state's economy between 2016 and 2017—with wildfires contributing more than the commercial, residential or agriculture sectors did in 2017."[2] Therefore, it is extremely important to avoid development in high fire hazard areas and assure the health of the County's forests, coastal sage scrub, chaparral, and other vegetation which plays a critical role in storing GHGs.

CRPSD believes that it is essential that the County consider alternatives that focus on future residential growth, including for low and very low-income housing, in or near existing cities that have transit and nearby jobs. Other criteria that should weigh heavily in any future development in the County is avoiding development in high and very high fire areas and reducing vehicle miles traveled.

CRPSD looks forward to actively participating in the development, adoption, and implementation of these critical documents.

Respectfully yours,

Marie Chen
Climate Policy Team Chair
The Climate Reality Project, San Diego Chapter
ximariechen@gmail.com

[2] Next 10. "2019 California Green Innovation Index." Publications 2019 California Green Innovation Index, 8 October 2019, https://www.next10.org/publications/2019-gii. Accessed 27 01 2021.

From: Jennifer Case
To: CAP
Subject: Comments to San Diego County Climate Update
Date: Thursday, January 28, 2021 2:20:05 PM
Attachments: Comments re SD Climate Action Plan-jg.docx

Thank you!

Jennifer Case
President, New Leaf Biofuel
619.236.8500

New Leaf Biofuel
2285 Newton Ave
San Diego CA 92113
P: 619-236-8500
F: 619-236-8585
www.newleafbiofuel.com

January 26, 2021

San Diego County Board of Supervisors

RE: San Diego County Climate Action Plan Update

Dear Chair Fletcher and Members of the Board:

Thank you for the opportunity to comment on the Climate Action Plan (CAP) Update to revise the 2018 CAP. New Leaf Biofuel has been a member of the San Diego business community since 2006. Our company collects used cooking oil from local restaurants and converts it to ultra-low carbon biodiesel at our plant in Barrio Logan. We believe that the use of low carbon biodiesel made locally should be highlighted in the updated CAP as a strategy to reduce greenhouse gas emissions, support local green jobs and to promote climate resiliency.

"Fossil fuel-based transportation is the largest emission sector in the County's inventory," responsible for 55% of GHG emissions in the region. Strategy T-3 of the CAP mentions several technologies available for reducing GHG emissions in transportation including electric cars, Compressed Natural Gas (CNG) for municipal fleets as well as Renewable Diesel (RD). Notably absent is Biodiesel, a sustainable, affordable renewable fuel that is plentiful in California. Biodiesel's benefits include:

- Biodiesel made from used cooking oil made locally is one of the lowest carbon fuels available, achieving a reduction in carbon of 85-90% compared to petroleum diesel. It also reduces particulate matter (PM) by 58%, total hydrocarbons (THC) by 57% and carbon monoxide (CO) by 34%.

- Biodiesel made locally from used cooking oil is a renewable fuel source, providing an upcycling opportunity for the waste cooking oil to be converted to a valuable product without depleting any resources.

- Biodiesel made locally supports local, green jobs.

- Biodiesel can be blended with RD at an R80/B20 blend which results in 100% displacement of fossil fuel.

- Since RD, a relatively new product, is in short supply globally, blending 20% biodiesel, which is plentiful, can extend the possibility for local San Diego area fleets to maintain a 100% renewable fuel profile for their heavy-duty transportation applications.

The County uses approximately 500,000 gallons of diesel per year in its own operations. **If the County transitioned its diesel usage to a R80/B20 blend, the 500,000 gallons of diesel displaced would result in a reduction of 4014 MT GHG per year!** (*Note that since RD has a higher carbon intensity (CI) score than locally produced Biodiesel, a straight RD blend would result in a lower GHG savings of 3762).* Compare this GHG savings to San Diego County's goal of transitioning 501 gasoline-powered fleet vehicles to Electric Vehicles (EVs) by 2027. This achievement will displace about 160,000 gallons per year of gasoline and only 1700 MT GHG per year. Transitioning to R80/B20 is almost a 2.5x improvement in GHG emissions reduction and can be accomplished today. These benefits will be even greater if biodiesel use can be expanded in other fleets across the county.

For more information on the benefits of blending Renewable Diesel and Biodiesel, please see the White Paper produced by the California Advanced Biofuels Alliance.
https://www.caadvancedbiofuelsalliance.org/a-2030-roadmap

Sincerely,

New Leaf Biofuel, LLC
a California limited liability company



Jennifer Case, Chief Executive Officer

From: Jessica Babcock
To: CAP
Subject: FW: Biological Resources Impacts in the SD County CAP
Date: Thursday, January 28, 2021 6:19:58 PM

Jessica Babcock

D 916.842.3163 | C 916.661.2764
E Jessica.Babcock@AscentEnvironmental.com

From: John Riedel <jriedel8837@gmail.com>
Sent: Thursday, January 28, 2021 6:18 PM
To: Jessica Babcock <jessica.babcock@ascentenvironmental.com>
Subject: Biological Resources Impacts in the SD County CAP

Hi Jessica,

I am a member of the San Diego Audubon Society Conservation Committee. There are concerns about the impacts to sensitive species, habitats, ecosystems, wetlands, and natural resources identified as Significant and Unavoidable in the CAP SEIR. These are not aligned with conservation measures and policy in the GPU such as NCCP and MSCP and others identified in the SEIR. Natural untouched ecosystems are wonderful Carbon sinks and plans that cause significant impacts to these habitats to address climate change is not the correct course of action. When projects become more defined and have to attend to the CEQA process, will Biological Resources be evaluated at the project level instead of tiering of this SEIR which comes to the conclusion that Biological Resources impacts are unavoidable? Thanks

Regards,
John Riedel
Jriedel8837@gmail.com

From:	Hannah Gbeh
To:	Kelly, Meghan; Bray, Kelly
Cc:	CAP
Subject:	Farm Bureau Comment Letter
Date:	Friday, January 29, 2021 12:25:27 PM
Attachments:	Farm Bureau CAP Letter 1.28.21.pdf

Dear County of San Diego,

Attached, please find the San Diego County Farm Bureau's comment letter on the Climate Action Plan NOP.

Best,
Hannah Gbeh

HANNAH GBEH *Executive Director*
420 S. Broadway, Ste. 200, Escondido, CA 92025
Office: 760.745.3023 hannah@sdfarmbureau.org
Cell: 760-504-4109
The Voice of Local Farming

FARM BUREAU San Diego County
The Voice of Local Farmers
Serving San Diego agriculture since 1914

January 28, 2021

County of San Diego
Planning and Development Services
Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Subject: Farm Bureau Comments on County Climate Action Plan

Dear Mrs. Bray,

Carbon sequestration in soils and vegetation is one of the few ways in which communities can simultaneously address climate mitigation and climate resilience. In a community in which agriculture is the 5th largest contributor to the economy, we cannot afford to ignore an opportunity to reduce our climate impacts in ways that strengthen food security, regenerate natural resources, and boost our agricultural sector. The County of San Diego must seize the opportunity to become a national leader in Carbon Farming by crafting a Climate Action Plan that both increases and encourages agriculture within the region while solving the climate crisis.

Carbon farming is a suite of farming and ranching practices that hold the potential for delivering multiple benefits: 1) reducing GHG's 2) building soil health, and 3) strengthening climate resilience. They include numerous practices that sequester stable soil carbon, sequester carbon in living vegetation, and reduce emissions from conventional practices such as fertilizer application. Practices include new plantings, composting, riparian restoration, cover cropping, reduced tillage, silvopasture, and several others that are already well-known as part of Natural Resource Conservation Service list of conservation practices. Compost application on cropland and rangeland has high GHG removal potential (1.5 – 4 MTCO2e /acre/year), and has resulted in remarkable increases in plant growth, and water holding capacity improvements, among several other co-benefits. Similarly, riparian restoration has GHG reduction potential of 1 MTCO2e/acre/year, and several important co-benefits including water quality improvements and habitat conservation.

The San Diego County Farm Bureau requests the following items be incorporated into the text of the Climate Action Plan and associated CEQA analysis:

- **Stop the Decline of Agriculture:** The County must conserve the existing agricultural carbon storage and sequestration in the existing agricultural community by addressing root drivers behind the decline in local agricultural lands. From 2000–2015, approximately 10,000 acres of orchards, estimated to contain one million trees, were taken out of production by farmers in the greater San Diego County, decisions largely attributed to rising, prohibitive water costs, along with some fire losses. The estimated GHG emissions value of these losses amount to a total 375,125 MTCO2e, which is the sum of lost carbon stored in the trees, and the foregone cumulative sequestration over a 15-year period. In a single year snapshot of 2014, tree losses amounted to 89,321 MTCO2e, which is over half of the entire estimated agricultural emissions for the unincorporated county that year.

These numbers are noteworthy for several reasons. First, the contributions of sequestration in orchards, and the loss thereof, are significant. Secondly, the economic pressure of changing climate conditions are apparently already resulting in accelerated GHG emissions. And most importantly, investments in halting the attrition of existing perennial croplands will have significant impacts on climate mitigation for decades to come[(1)].

- **Local Mitigation Banks:** GHG mitigation is a source of significant resources for carbon farming implementation and must be implemented by the County during the Climate Action Plan process. The San Diego agricultural community stands ready to create and implement cutting edge local, agricultural carbon sequestration banks that not only provide much needed sequestration credits but also bolsters our local economy and regional food security. Existing mitigation banks for sensitive habitats can serve as a model for how to implement GHG mitigation banks through partnerships with the local agricultural community.

- **Data Analysis and Usage:** Methodologies exist that enable us to estimate net carbon sequestration in agricultural lands. The County's past Climate Action Plans have used faulty data to analyze baseline conditions related to agriculture and to analyze the carbon sequestration potential from agricultural practices. There must also be a common set of metrics by which we measure our impacts and make corrections where needed.

- **Stakeholder Engagement:** The County of San Diego is home to a wide variety of agriculture experts that can assist the County in navigating the GHG sequestration potential for Carbon Farming, including University of California Cooperative Extension, San Diego Farm Bureau, the California Avocado Commission. The CAP process must include as part of their advisory group experts on carbon farming so that we can develop and advance climate friendly agricultural strategies in the region.

- **Voluntary Compliance:** Any CAP measures related to agriculture must be voluntary, not regulatory, and must encourage the economic viability of the local agricultural industry. The Climate Action Plan cannot diminish the value of land or private property rights. Although San Diego farmers and ranchers have tremendous potential to make a positive impact on managing excess carbon in our environment, they do not have the financial resources to carry that burden alone and the County needs to offer considerable investments in financial incentives for these programs.

Sincerely,



Hannah Gbeh
Executive Director
San Diego County Farm Bureau

Citations: (1) Linking Climate-Friendly Farming Practices to San Diego County's Climate Action Plan: An Opportunity Analysis of Carbon Farming in the Unincorporated County. March 2018. Puja Batra, Batra Ecological Strategies.

From:	Elizabeth Urquhart
To:	CAP
Subject:	CAP Input Submission
Date:	Saturday, January 30, 2021 1:20:47 PM
Attachments:	San Diego Climate Action Plan Update Input 1.30.21.pdf

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Please accept attached CAP input provided by StopCottonwoodSandMine.org Board of Directors.

Thanks,
Elizabeth Urquhart
(619) 405-3252

Elizabeth Urquhart, M.Ed.
Director of Compliance



StopCottonwoodSandMine.org
Save Our Community

COUNTY OF SAN DIEGO 2021 CLIMATE ACTION PLAN INPUT
January 30, 2021

StopCottonwoodSandMine.org supports recommendations made by the San Diego Sierra Club which includes the following:

First and foremost, the County must immediately declare a climate emergency. The County must also do more than just neutralize greenhouse gas emissions by seeking to achieve current standards of "net zero" emissions. Rather, the County should be working to greatly reduce GHG emissions below 1990 baseline with net negative emissions to help reverse global climate destruction.

The County must emphasize reducing emissions in disadvantaged communities, locate GHG mitigation in the same disadvantaged communities in which emissions occur, and establish a GHG mitigation bank directly benefiting disadvantaged communities. Other GHG mitigation must occur entirely within the County. And existing multiple species conservation programs should be utilized to establish a natural habitat land mitigation bank for GHG emissions.

The County should implement the following measures to achieve net negative 100% GHG emissions by 2035:

1. Establish a Community Choice Aggregation program to provide 100% renewable energy by 2035.

2. Downzone lands in Calfire's high/highest fire risk areas and highest vehicle miles (VMT) travelled areas of the county.

3. Bar General Plan amendments for increased commercial or residential development in Calfire's high/highest fire risk areas and highest vehicle miles (VMT) travelled areas of the county.

4. Purchase Fanita Ranch, Lilac Hills, Newland Sierra, Otay Ranch Village 13, Otay Ranch Village 14/16/19, Rancho Guejito, and/or Harvest Hills to avoid conversion to development and/or as a natural habitat lands GHG mitigation bank.

5. Establish a program to recycle 100% of all organic waste.

The County should implement the following additional measures to achieve net negative 100% GHG emissions by 2035:

1. Convert natural gas or propane utilities to electric at County facilities.

2. Install photovoltaic solar panels, wind turbines, and/or other onsite renewable energy and batteries at County facilities.

3. Install electric heat pumps to provide air and water heating and cooling at County facilities.

4. Install improved weatherization and insulation at County facilities.

5. Install graywater systems at County facilities.

6. Convert county vehicle fleets to electric vehicles and plug-in hybrid electric vehicles.

7. Provide dividend account parking for all County employees.

8. Increase diversion of solid waste and capture landfill methane.

9. Prohibit all gas-powered leaf blowers.

10. Plant and maintain trees. Priority should be given to native trees when possible.

11. Collaborate with SANDAG to support and implement the Five Big Moves.

12. Support short term extension of mass transit prior to implementation of the Five Big Moves.

13. Support construction of bicycle trails and protected lanes for bikes and scooters.

14. Support installation of public electric vehicle charging stations.

15. Support construction of pedestrian overpasses and other pedestrian infrastructure.

16. Support establishment of a local natural habitat lands GHG mitigation bank with avoided conversion to development and conservation management in perpetuity of habitat land inside or bordering existing or planned regional multiple species conservation plan preserves (e.g. City of San Diego Multiple Habitats Planning Area or County of San Diego Pre-Approved Mitigation Area) or the Cleveland National Forest inholdings.

17. Support establishment of a local disadvantaged communities GHG mitigation bank with replacement of commercial or personal GHG-emitting vehicles and equipment with electric vehicles and equipment, commercial or residential electrification, and other energy efficiency improvements to businesses or residences.

The County should provide incentives and subsidies to existing businesses and residences for the following measures to achieve net negative 100% GHG emissions by 2035.

1. Conversion of natural gas or propane utilities to electric.

2. Installation of photovoltaic solar panels and/or other onsite renewable energy and batteries.

3. Installation of electric heat pumps to provide air and water heating and cooling.

4. Installation of improved weatherization and insulation.

5. Installation of graywater systems.

6. Planting and maintaining trees.

7. Free mass transit passes to students and residents of disadvantaged communities.

8. Carpooling.

9. Purchase of electric vehicles.

10. Free parking for electric vehicles

11. Capture methane from agricultural facilities.

12. Avoided conversion to development of agricultural cropland.

13. Production and distribution of locally grown produce and foods.

The County shall implement the following measures to achieve net negative 100% GHG emissions from new public projects and private commercial developments[2](developments) by 2035:

a. **CEQA Significance –** Public projects and private commercial developments' GHG emissions shall be considered "significant" under CEQA.

b. **CEQA Overriding Considerations –** CEQA findings of overriding considerations shall not be provided for public projects and private commercial developments with significant GHG emissions/impacts.

c. **GHG Emissions Threshhold –** Public projects and private commercial developments shall achieve net negative 100% GHG emissions through onsite minimization and offsite mitigation.

d. **Developments' GHG Emissions Lifespans –** Public projects and private commercial developments' lifespans shall be a minimum of 100 years for calculation of: a) GHG emissions; b) onsite project design to minimize GHG emissions; and c) any offsite mitigation.

e. **Minimization of GHG Emissions –** Public projects and private commercial developments shall minimize onsite GHG emissions by incorporating climate-friendly and environmental design to the maximum extent feasible with the minimum following conditions:

1. Developments shall be electric and prohibit plumbing for natural gas.

2. Developments shall include photovoltaic solar panels and/or other onsite renewable energy and onsite batteries to provide 100 percent of any project's annual electricity

needs.

3. Developments shall include electric vehicle charging stations to serve all projected project-related vehicles.

4. Developments shall include electric heat pumps to provide one hundred percent of air and water heating and cooling.

5. Developments shall prohibit vehicle idling.

6. Developments shall include graywater systems.

7. Developments shall minimize water consumption.

8. Developments shall include shade trees.

9. Developments shall provide transit passes to residents.

f. **Mitigation of GHG Emissions –** To the extent that onsite minimization of any public or private commercial development project's GHG emissions to net negative 100% is not feasible, offsite GHG mitigation shall be provided to achieve net negative 100% GHG emissions that is in addition to any existing laws, regulations, or plans already compelling reductions in GHG emissions.

1. Developments' GHG offsite mitigation shall be entirely within San Diego County.

2. Developments' GHG offsite mitigation shall be entirely within the same disadvantaged communities as emissions.

3. Offsite GHG mitigation may include any of the following:

a) Preservation of natural habitat land inside or bordering existing or planned regional multiple species conservation plan preserves (e.g. City of San Diego Multiple Habitats Planning Area or County of San Diego Pre-Approved Mitigation Area) or private holdings within Cleveland National Forest. Preservation of natural habitat land as GHG mitigation shall include private property acquisition and conservation stewardship management in perpetuity. The amount of GHG mitigation provided by preservation of natural habitat land shall be determined by calculating reduced GHG emissions on the property over one hundred years resulting from avoided conversion to development of the number of existing legally entitled or zoned units and/or square feet on the preserved property.

b) Direct replacement of GHG-emitting vehicles and equipment (e.g. diesel generators) with electric vehicles and electric equipment including at any site under the jurisdictional authority of the Port of San Diego (including cargo and cruise ship terminals), of the Metropolitan Transit System, of the North County Transit District, and of the San Diego Airport Authority.

c) Create environmental justice grant programs in disadvantaged communities for direct replacement of commercial or personal GHG-emitting vehicles and

equipment with electric vehicles and equipment, commercial or residential electrification, and other energy efficiency improvements to businesses or residences.

d) Direct reductions in water consumption.

The County shall implement the following measures to minimize GHG emissions from new private residential development projects:

Personal residential remodelling and addition projects shall achieve net zero GHG emissions through onsite minimization with incorporation of climate-friendly and environmental design with the following conditions:

1. All Projects shall be electric and prohibit plumbing for natural gas.

2. Projects shall include electric heat pumps to provide one hundred percent of air and water heating and cooling.

3. Projects shall minimize water consumption.

4. Projects should include photovoltaic solar panels and/or other onsite renewable energy and onsite batteries.

5. Projects should include electric vehicle charging stations to serve all projected project related vehicles.

6. Projects should include graywater systems.

7. Projects should include tree planting.

Submitted By:

StopCottonwoodSandMine.org Board of Directors

Email: info@stopcottonwoodsandmine.org

Website: www.StopCottonwoodSandMine.org

January 30, 2021

From:	John Riedel
To:	CAP
Subject:	SDAS Comment Letter on Climate Action Plan Notice of Preparation
Date:	Wednesday, February 3, 2021 11:48:39 AM
Attachments:	SDAS_CAP NOP Comment Letter_final.pdf

Dear Kelly Bray,

Attached is the San Diego Audubon Society's letter on the Climate Action Plan Notice of Preparation. Please let us know you received this email and can open the attachment. Thank you for the opportunity to provide comments.

--

Regards,
John Riedel
Jriedel8837@gmail.com

February 4th, 2021

County of San Diego Planning & Development Services
Attention: Kelly Bray CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123
CAP@sdcounty.ca.gov

Subject: County of San Diego Climate Action Plan (PDS2020-POD-20-016 and PDS2020-GPA-20-004, and PDS2020-ER-20-00-002)

Dear Kelly Bray,

The San Diego Audubon Society is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948. Our work has included invasive plant removal and revegetation events, training community scientists, advocating for developments and park management, educating school children about the importance of natural habitats, and many other projects. Over the years we have partnered with thousands of volunteers to carry out these goals. We endorse progressive action in the Climate Action Plan (CAP) to navigate climate change by embracing protection, enhancement, and rehabilitation of the region's natural resources. Within that framework, we suggest the following in regards to the CAP Notice of Preparation.

Strategy A-2 Increase Carbon Sequestration: The ordinance will include water conservation strategies to minimize water use, which could include planting drought-tolerant and native trees and prioritizing tree plantings in areas served by recycled water and greywater infrastructure. The SEIR should provide data about which native trees and other vegetation are most effective in storing carbon and in which habitat they would be appropriate as defined in 2.4.1.1 Terrestrial Communities and Habitats. Studies reveal a variety of trees prove to be more effective in carbon sequestration. A profile of which variety of native trees or other plants for each habitat should be provided for project level guidance. No trees or plants on the CAL-IPC list should be used or encouraged. The carbon required to provide the water needed for each type of vegetation should be deducted from its nominal sequestration value.

Strategy T-4 Invest in Local Projects to Offset Carbon Emissions: Included in this list is wetland creation among others. Wetland creation in the Fiesta Island Amendment and The ReWild Mission Bay proposal to the Mission Bay Master Plan are excellent examples for using natural resources for carbon sequestration. Cutting edge research through local institutions are quantifying the value of coastal wetlands, including the ReWild Mission Bay study, for carbon sequestration. Undisturbed, natural coastal wetlands have been shown to be very effective at sequestering carbon and should have a more robust profile in the CAP instead of mitigation of impacts to natural resources. As sea level rise occurs, much of our wetlands and shallow subtidal habitats will lose their sequestration value as the depth increases. So the tabulations of wetlands and shallow subtidal habitats should either identify enhancement programs that would keep them at optimum depths for sequestration, or identify the sequestration value as a function of time as the depths change.

Strategy A-2 Increase County Tree Planting: Prepare and adopt a tree planting program for the unincorporated county to plant a minimum of 3,500 trees annually starting in 2017. Description: This

measure is a County initiative. This details the carbon capture potential of trees and we reiterate that native tree guidance be provided in the SEIR as they are paramount to the health of local wildlife and native plants within the ecosystem. The Heritage Tree Preservation Program should be expanded with more data driven guidelines and properly linked into the CAP for better implementation. Again, the carbon expended to water these trees should be deducted from the nominal sequestration value of these trees.

Bio-2.1 Revise the Ordinance Relating to Water Conservation for Landscaping to incorporate appropriate plant types and regulations requiring planting of native or compatible non-native, non-invasive plant species in new development. This is a project that SDAS has been advocating for in partnership with the California Native Plant Society. We suggest the SEIR provide more details of which native plants would be appropriate within the different habitats across the county. Local home owners associations should provide educational content to the public as a resource to native plants for their residences.

Many of the Strategies in the SEIR state that the construction and operation of technology that could affect special-status species, riparian habitat or other sensitive natural communities; federally protected wetlands; wildlife movement corridors or nursery sites; or conflict with local policies or ordinances, and adopted habitat conservation plans or NCCPs. This is in direct conflict with the adopted 2011 GPU Policies including: Policy COS-1.2: Minimize Impacts, Policy COS-1.3: Management, Policy COS-2.2: Habitat Protection through Site Design, Policy COS-3.2: Minimize Impacts of Development, Policy LU-6.1: Environmental Sustainability. We urge that such strategies be eliminated or modified to avoid these substantial negative impacts.

There are 10 mitigation measures from Bio-1.2 to Bio-2.4 to address impacts to biological resources, but the SEIR is not detailed enough to provide adequate cover to project level impacts found to be significant. It should be applied in this SEIR that discretionary projects provide a project level biological resources impact study instead of using the broad conclusions in this SEIR as coverage for impacts found to be significant. There is a broad acknowledgment that mitigation measures to biological resources are implemented within the county if feasible. Also, the mitigation measures are transparent, enforceable and demonstrably effective. Beyond the updates to mitigation measures CC-1-2, CC-1.7 and CC-1.8, we request all measures CC-1.1 to CC-1.8 be reviewed for updates.

Strategy E-2 Increase Renewable Energy describes Implementation of this measure could result in construction of small-scale distributive energy renewable systems, large-scale photovoltaic solar, photovoltaic concentrator technology or wind turbines. We urge that concentrator technology not be implemented unless it is improved so that it will not vaporize passing birds. If it is used, on-site radar detection systems should be implemented to identify bird mortality to allow adequate on-going mitigation. Such systems should have a permitted mortality limit. When the limit is exceeded the plant would be shut down until its next permit cycle. The Strategy also describes potential impacts to wildlife movement corridors or nursery sites. Important bird habitat and corridors need to be fully understood and wind turbines must be kept from these areas. Terrestrial wildlife corridors also need to be avoided. It is noted in the SEIR that impacts related to special-status species resulting from small wind turbines would be a potentially significant impact (Impact BIO-4). This strategy should be expanded to emphasize photovoltaic systems mounted on buildings with large roofs, large parking lots, reservoirs, etc. to avoid environmental damage and the need and cost to mitigate.

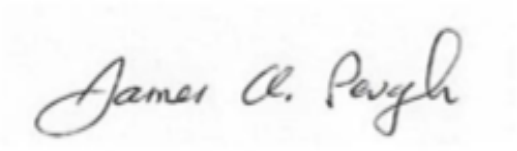
Mitigation for Strategy E-2 refers to the 2012 Wind Energy EIR, Mitigation Measure CAP M-BIO-1 and M-BIO 2 specifically. It is also noted that further mitigation was rejected as infeasible. As large-scale photovoltaic solar, photovoltaic concentrator technology, or wind turbines are going to be prominent in the CAP program, a more robust and coherent mitigation strategy has to be formulated for effective protections of vital biological resources. If adequate mitigation is not feasible, strategies should be

changed so the impacts will be reduced so that mitigation is feasible and adequate. The California Desert and Recreation Act of 2019 keeps natural resources protected and considers infrastructure described herein. A policy following this Act implementation provides protections of natural resources and wildlife habitat while allowing for CAP infrastructure.

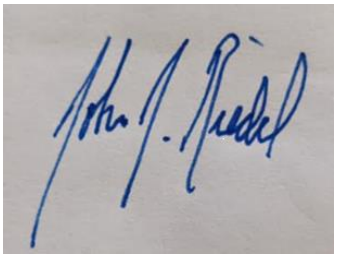
Section 2.4.4.3 and 2.4.4.4 of the SEIR describes impacts to federally protected wetlands and wildlife corridors, and that beyond implementation of 2011 GPU PEIR mitigation measures, there could be site degradation and significant impacts. Beyond project level mitigation measures, there should be CAP mitigation measures to protect against impacts to these natural resources which serve as a backbone to natural resource carbon sequestration in addition to protections afforded to federal and state protected species and their habitats. One of the strategies in the CAP is enhancement of wetlands as a tool for carbon capture, so it follows that these habitats that exist should be fully protected and enhanced to maintain their sequestration value for the future

Conclusively, we fully support progressive action to reduce climate change with implementation of the CAP. We also strongly support as a tool protecting, enhancing and rehabilitating natural resources as an effective carbon sequestration strategy instead of causing significant impacts to these resources at the expense to build infrastructure to address climate change. We believe these two goals that can exist concurrently. We also urge that this CAP modify its Strategies so that we can aggressively lower our greenhouse gas emissions in ways that will protect, or at least fully mitigate for impacts to, our native wildlife and habitats Thank you for the opportunity to comment on the CAP Notice of Preparation and we look forward to being engaged in this process moving forward.

Sincerely,



James A. Peugh
Conservation Chair
and,



John Riedel
Conservation Committee

From: David Harris
To: CAP
Subject: San Diego 350 comment letter
Date: Wednesday, February 3, 2021 1:09:21 PM
Attachments: SD350 Letter - County CAP SEIR 2_3_21 .pdf

Attached please find our submittal in response to the SEIR scoping for the CAP Update.

David Harris
SanDiego350

SAN DIEGO 350
CLIMATE ACTION

February 3, 2021

County of San Diego Planning & Development Services
Attention: Kelly Bray CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: COUNTY OF SAN DIEGO CLIMATE ACTION PLAN UPDATE
Supplemental Environmental Impact Report - Project Numbers: PDS2020-POD-20-016 and PDS2020-GPA-20-004; Environmental Review Number: PDS2020-ER-20-00-002

Dear Ms. Bray:

Please accept this submission in response to the County's NOP for this CAP update. SanDiego350 is an inclusive volunteer organization building a movement to prevent the worst impacts of climate change and climate injustice. We strive to create a future that supports a livable planet and just society. SanDiego350 achieves its goals through education and outreach, public policy advocacy, and mobilizing people to take action.

SanDiego350 supports the County's newly adopted climate action goal which was approved by the Board of Supervisors on 1/27/21. This ambitious goal is to drastically reduce greenhouse gas (GHG) emissions and achieve zero carbon in the San Diego region by 2035. To accomplish this goal, the County needs to establish more aggressive targets in its Climate Action Plan (CAP) update to reduce emissions from three sectors: transportation (45% of GHGs), energy (24% of GHGs), and natural gas in buildings (9%).

Below are our Public Policy Team recommendations for the County's CAP Update SEIR:

Section 1. Built Environment and Transportation

Land Use Decisions- The County makes land use decisions for all unincorporated communities, agricultural zones, and backcountry areas of San Diego County. The County should prohibit urban and suburban residential and commercial development in all agricultural zones and low-density zoned rural areas. Any General Plan Amendment that proposes increasing the density above the levels established in the County's 2011 General Plan should be soundly rejected. Instead, the County should consider providing density bonuses and other development incentives for infill projects along major transit corridors in the County's already-urbanized communities.

Mode Share Goals- The County needs to adopt aggressive transportation mode share targets in the already-urbanized areas of the County and promote the development of safer bike lanes, complete streets, and convenient and affordable rapid transit.

SB 743 CalTrans Report- Passed by the State legislature and signed into law SB 743 with the intent to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas emissions." The Governor's Office of Planning and Research (OPR) has issued new metrics for identifying and mitigating transportation impacts within CEQA. For land use projects, OPR identified Vehicle Miles Traveled (VMT) per capita, VMT per employee, and net VMT as new metrics for transportation analysis. Implementation of SB 743 began in July, 2020, but the County's adopted guidelines are inconsistent with the law and with the State OPR Guidelines. (The County is currently being sued by the Sierra Club and the Cleveland National Forest Foundation over these guidelines). Therefore, the County should amend its guidelines to comply with State law, as soon as possible; and recognize this step in the new CAP and its sEIR.

Telecommuting- Since the pandemic began last March, an increasing number of businesses have allowed employees to work from home. This has significantly reduced traffic on local roads and freeways during commute hours, and thus reduced carbon emissions. The County should encourage telecommuting by collaborating with businesses to devise incentives that encourage employees to work from home.

Support the planning effort to create a world class transportation system- The 2021 Regional Transportation Plan, currently under development by SANDAG, will synchronize "5 Big Moves" to deliver a fully integrated transportation system for the San Diego region. The 5 Big Moves include complete corridors, transit leap, mobility hubs, flexible fleets, and the next Operating System (OS) for transportation coordination (the "brain" of the entire system that coordinates the full range of transportation options). SANDAG's framework promises to enhance connectivity, increase safety, and reduce GHG emission from vehicles by providing real alternatives for commuters. The County should support SANDAG's RTP planning process, build community and business support for a massive expansion of public transit, prioritize transit over roadway expansion projects, and increase funding for complete streets and safe bike lanes.

Section 2. Renewable Energy

Community-based Microgrids- In the updated CAP, encourage the development of microgrid energy and battery storage projects, with a focus on communities of concern that have not yet benefited from the green energy revolution.

Building Electrification- Adopt a reach code that requires all new residential and commercial development projects to be all-electric. Develop incentives for homeowners and businesses to retrofit existing buildings with all-electric heating systems and appliances. Promote heat pumps to replace existing space and water heating systems.

Section 3. Agriculture and Conservation

Sustainable Food Supply- Adopt a set of strategies focusing on the importance of food in both consumption and production:

1) adopt a procurement plan (e.g. the Good Food Purchasing Program) for County operations that encourages the purchasing of less carbon-intensive foods
2) develop an education and outreach program that promotes the adoption of healthier and low-carbon diets in households and institutions
3) incentivize carbon-farming practices and use technology such as COMET-farm to quantify additional carbon sequestered in vegetation and soils so the GHG reduction can be included in the CAP's overall mitigation numbers.
4) Adopt the recommendations from the 1/28/2021 comment letter from the San Diego County Farm Bureau.

Section 4. County Operations

Consumption-based GHG Inventory
Adopt a method for assessing the lifecycle greenhouse gas emissions caused by the consumption of goods and services associated with activities originating from within the County (e.g. Consumption-Based Emissions Inventory). This involves recognizing that relying solely on a sector-based emissions inventory underestimates the emissions that the County is responsible for and that consumption is a central driver for greenhouse gas emissions associated with lifecycle carbon footprint of goods and services occurring within the County.

Section 5. Social Equity

Climate Equity Index- Include an environmental justice component in the CAP Update that provides equity in the implementation of CAP measures and activities. As the County transitions away from fossil fuels in the energy and transportation sectors, it should ensure that underserved communities share in the benefits of clean renewable energy, will have access to skilled training programs for new green jobs, and access to capital to start or expand green economy businesses.

Thank you for inclusion of SanDiego350's submittal for elements of the CAP update, and analysis in the SEIR. If you have any questions, please email me at davidh@sandiego350.org

Sincerely,

David Harris, Chair
SanDiego350 Climate Action Plan Committee

Marie Chen and Pia Piscatelli, Co-Chairs
SanDiego350 Public Policy Team

From:	Noah Harris
To:	CAP
Subject:	Climate Action Campaign, Comments on NOP for the County CAP"s SEIR
Date:	Wednesday, February 3, 2021 3:29:14 PM
Attachments:	2021-2-3-CAC Comments on NOP for County CAP and SEIR .pdf

---

Hi--please accept Climate Action Campaign's comment letter, attached, in response to the Notice of Preparation for an Environmental Impact Report for the County's Climate Action Plan.

Thank you for the opportunity to provide input on the development of this critical document.

Best,
--
Noah Harris (he/him)
Transportation Policy Advocate
Climate Action Campaign
3900 Cleveland Ave, Suite 208
San Diego, CA 92103
(310) 562-8046

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Twitter: @sdclimateaction
Instagram: @sdclimateaction
Facebook.com/ClimateActionCampaign

Like what we do? Support Climate Action Campaign today.

Our Mission is Simple: Stop the Climate Crisis

February 3, 2021

VIA EMAIL: CAP@sdcounty.ca.gov

County of San Diego
Planning and Development Services
Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Re: Comments on Notice of Preparation (NOP) for an Environmental Impact Report for the County of San Diego Climate Action Plan (CAP)

Climate Action Campaign (CAC) is an environmental nonprofit organization based in San Diego and Orange County with a simple mission: to stop the climate crisis through effective policy action.

The 2018 UN IPCC report, *Global Warming of Degrees Celsius*, warns that in order to stave off climate catastrophe, we must limit global warming to 1.5°C above pre-industrial levels, citing drought, floods, extreme heat and poverty for hundreds of millions of people if temperatures rise above 1.5°C. To remain within this threshold, we must cut global emissions by 45% by 2030 and entirely eliminate emissions by 2050. This critical moment in history demands that at every level of government, we must take unprecedented action to significantly reduce greenhouse gas emissions and ensure a safe, livable, and dignified future for all.

In order for the County to do its part to slash greenhouse gas emissions and create sustainable, equitable, and prosperous communities, we recommend the following Draft EIR components and emissions reduction measures:

CEQA Requires Enforceable Measures with Detailed Deadlines

CEQA is clear about what is required for a qualified CAP. For a CAP to function meaningfully as a roadmap to its reduction target, the measures in the plan must be enforceable — which means

they must be specific, unambiguous, and contain clear requirements. Voluntary measures violate these CEQA guidelines.

In California Riverwatch v. County of Sonoma et. al (2017), the court stated that in CAPs used for tiering, "any measures or requirements imposed [must] be sufficiently defined to be enforceable." This means that for the CAP as a whole to be legally binding, the measures that comprise it must be enforceable. The measures within the CAP must be specific, evidence-based, and contain mandatory requirements, all of which serve to make the CAP as a whole meaningfully enforceable.

Significance Thresholds In Line With State Targets

The thresholds of significance for GHGs should be any level of emissions that will cause a violation of the state's GHG emission targets, which include:

- SB 32, which mandates statewide GHG emissions reductions of 40 percent below 1990 levels by 2030.
- Executive Order S-3-05, which mandates statewide GHG emissions reductions of 80 percent below 1990 levels by 2050. Compliance with S-3-05 should be of particular legal concern given the precedent set in the SANDAG RTP lawsuit.
- Executive Order B-55-18, which mandates statewide carbon neutrality as soon as possible, and no later than 2045, and net negative emissions thereafter.

Local targets that would contribute to emissions above these levels should be considered to have a significant impact.

Recommended Greenhouse Gas Emissions Reduction Strategies

In order to meet state greenhouse gas goals, including the Board's recent direction to align the CAP with Executive Order B-55-18, the County should include the following policies and strategies:

- **Zero Carbon:** As a long-term planning document, we urge you to ensure the CAP horizon year is extended to 2045 or later, and that the emissions reduction target commits to zero carbon by 2045 or sooner. To stave off the most devastating impacts of climate change, we must entirely eliminate greenhouse gas emissions as soon as possible.

  Additionally, the County should align the CAP's emissions reduction target and strategies in support of the forthcoming Regional Sustainability Plan and its goal to achieve zero carbon by 2035.

- **100% Clean Energy:** Not only is 100% Clean Energy the nation-leading standard, it is also necessary to meet California GHG targets. Accordingly, eight cities in the San Diego region have committed to 100% clean and renewable electricity by 2030 or 2035. Shifting to clean and renewable energy not only reduces greenhouse gas emissions, but it also spurs local investment and family-sustaining jobs from clean energy technologies. A 100% clean energy goal would be consistent with the goals of other Climate Action Plans in the region.

- **Community Choice Energy (CCE):** Community Choice is the single most powerful emissions reductions strategy at the local level, and it is the only viable pathway to 100% clean energy. The County should commit to and integrate Community Choice Energy into its CAP as a way to help steeply reduce carbon emissions, and provide choice and competitive energy rates.

- **Building Electrification:** Even as our cities work to achieve 100% clean electricity, natural gas remains one of the most significant sources of emissions in our region, so to fully transition away from fossil fuels, we must reduce and ultimately eliminate natural gas consumption. Because appliances last several decades, it is critical that we start building electrification today by incorporating key building electrification measures in the CAP. We recommend requiring all newly constructed or renovated buildings to be all-electric, as well as providing incentives and streamlining to electrify existing buildings. We also recommend centering equity in any building electrification plan to protect our most vulnerable from being stranded with this dangerous asset, and developing an inclusive community engagement process to gather feedback from communities of concern about their needs, and share how building electrification can improve their lives.

- **Energy and Water Efficiency**: The CAP should set targets for water conservation and energy efficiency for single-family, multifamily, commercial, and municipal buildings, as well as plan for ordinances to help reach those targets.

- **Zero Emissions Vehicles:** The County should include a strategy to transition to a fully electric municipal fleet.

- **Transit, Walking, Biking:** The CAP should include mode share targets that define the percent of commuters who will walk, bike, and take transit to work by the plan's horizon year. Mode share goals help jurisdictions facilitate a shift away from car-centric growth, advocate for assistance for better transit infrastructure, and help communities plan for

anticipated or desired health outcomes. The CAP should include a detailed roadmap with specific and actionable strategies to meet the mode share targets. Strategies to increase mode share include fostering safe and convenient biking, walking, and transit opportunities. These infrastructure investments also provide numerous co-benefits that create safer, healthier, more prosperous communities.

- **Smart Growth Land Use Policies with Affordable Housing Near Transit**: With 45% of the County's emissions currently come from on-road transportation, the CAP should include a goal to reduce vehicle miles travelled (VMT) to be achieved through smart growth policies that increase mixed-use density and affordable housing near job centers and transit. Building affordable housing near transit is a necessary strategy to reduce VMT and reduce GHG emissions.[1] Building housing in high-VMT, high fire hazard areas far away from jobs and transit remains one of our region's greatest sources of skyrocketing emissions, threatens our natural and working lands, and increases the likelihood and severity of fatal wildfire events.

  The CAP and SEIR's project alternatives should further specify where smart growth and density should be targeted and what transportation mode share, VMT, and land use goals should be set for specific communities throughout the unincorporated County, so there is clarity for the public and staff. The City of San Diego's ongoing struggle to ensure that community plan updates in urban, transit-priority communities are aligned with CAP targets, and to agree upon what goals each community is responsible for meeting, highlights the importance of including both neighborhood-level specificity and a jurisdiction-wide approach in the CAP.

  The 2018 CAP's SEIR Mitigation Measure GHG-1 permitted General Plan Amendments (GPAs) projects to find no significant impacts based only on the purchase of overseas offsets credits. Proposed amendments to the 2011 GPU are typically sprawl projects in rural areas without adequate access to transit. These General Plan Amendment projects would necessarily add VMT and increase emissions, but could still comply with the CAP's offset requirements.

  However, the County has land use authority and should ensure that all projects, including GPAs, are not reliant on international offset schemes, and are located in areas that have direct access to transit and that reduce VMT.

[1] Center for Neighborhood Technology, California Housing Partnership Corporation. (2016). *Location Matters: Affordable Housing and VMT Reduction in San Diego County.* Retrieved from: https://static1.squarespace.com/static/5a6bd016f9a61e52e8379751/t/5a80f33bec212d81181be01d/1518400319715/Climate+Action+-+Affordable+Housing+And+VMT+Reduction.pdf

- **Urban Tree Canopy and Climate Resilience:** With proper management and appropriate choice in tree variety, trees help sequester carbon, filter the air, and provide much needed shade in a warming environment. The CAP should commit to a specific urban tree canopy coverage goal and a roadmap to achieving that goal.

- **Zero Waste**: Waste decaying in landfills emits methane, a potent greenhouse gas. The CAP should analyze the impact of achieving zero waste through strategies such as eliminating single-use materials, composting and capturing landfill gas.

- **Social Equity & Environmental Justice:** Climate change hits hardest in communities that are disproportionately burdened by multiple sources of pollution and face health and socioeconomic challenges. California's Environmental Health Screening Tool, CalEnviroScreen 3.0, identifies communities most vulnerable to pollution and climate impacts so that the state and local governments can direct attention and resources toward the pursuit of environmental justice in those places. However, we also recognize that there are historically underinvested communities in San Diego County that are not adequately represented via this tool, and we encourage you to develop metrics that specifically identify the most vulnerable unincorporated County residents.

  The CAP should explicitly define how the communities most impacted by the climate crisis and environmental injustices will be prioritized in the implementation of GHG reduction strategies, including affordable housing development and investments in urban forestry, active transportation, renewable energy, and energy efficiency measures.

  The development and implementation of these strategies and benchmarks should take place in consultation with a diverse set of stakeholders and organizations that represent low-income communities of color who are disproportionately harmed by a fossil fuel economy and are hurt first and worst by the impacts of a warming climate.

  For examples of Climate Action Plans that integrate equity and jobs, we recommend referencing the King County 2020 Strategic Climate Action Plan, Oakland Equitable Climate Action Plan, the "Planning for a Boston Green New Deal and Just Recovery" Plan, and the Los Angeles's Sustainability Plan "LA's Green New Deal."

Focus on Direct Emissions Reductions, Not Offset Schemes

Finally, while the 2018 CAP called for the establishment of a "Local Direct Investment Program" to fund and implement GHG offset projects, it did not provide substantial evidence that these projects would help achieve progress towards the County's emissions reduction targets. The CAP must focus on real emissions reductions, not offset schemes that allow for continued pollution, to achieve its overall goals.

The CAP is required by Mitigation Measure CC-1.2 of the 2011 General Plan Update's (GPU) environmental impact report (EIR) as mitigation for climate change impacts from land uses designated in the General Plan. Therefore, all GHG reduction measures must be specifically laid out in the CAP so they are enforceable as mitigation under CEQA.

Conclusion

We appreciate the opportunity to provide comments on the NOP of the Draft Environmental Impact Report for the County of San Diego Climate Action Plan, and we are available as a resource throughout the process of CAP development.

Sincerely,



Noah Harris
Policy Advocate
Climate Action Campaign

From:	Matt Adams
To:	CAP
Cc:	Aghassi, Sarah; De La Rosa, Michael
Subject:	BIA Comment Letter on CAP Notice of Preparation
Date:	Wednesday, February 3, 2021 4:44:13 PM
Attachments:	02.04.21 BIA Comment Letter on County CAP Update.pdf

Attached please find correspondence from the Building Industry Association of San Diego County with our comments and recommendations regarding the notice of preparation for the County's Climate Action Plan update.

Respectfully submitted.

Matthew J. Adams
Vice President
www.biasandiego.org

February 4, 2021

Ms. Kelly Bray
County of San Diego, Planning & Development Services
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123
CAP@sdcounty.ca.gov

BUILDING INDUSTRY ASSOCIATION OF SAN DIEGO COUNTY

RE: Comments on Notice of Preparation for County of San Diego Climate Action Plan Update

Dear Ms. Bray:

Thank you for this opportunity to provide input and recommendations on the Notice of Preparation (NOP) for the County of San Diego's Climate Action Plan Update. The Building Industry Association of San Diego County represents over 650-member companies comprising a workforce of 35,000 men and women in the San Diego region. We are hopeful that the third time will be the charm for the County's CAP efforts, as the County, impacted industry sectors, and interested constituents will benefit from a stable platform from which to tackle GHG reduction in the County's unincorporated region.

The BIA strives to represent and support the efforts of its member companies to build all types of residential and commercial projects in the region. The BIA also recognizes and embraces its role in pursuing and implementing sustainable land use design as a strategy to address climate change. As such, we remain committed to partnering with the County to identify feasible pathways to achieve meaningful and proportional reductions in GHG emissions from new development. It is imperative that any such actions not impede the ability to provide housing in the unincorporated area.

At this early time in the CAP Update process and following our review of the NOP, we offer the following comments:

1. On January 13, 2021, the County Board of Supervisors directed County staff to "not rely on the purchase of carbon offsets to meet emission reduction targets" in the CAP Update. (See County of San Diego Board of Supervisors, Wednesday, January 13, 2021, Minute Order No. 5.) We view this Board directive as a pre-decisional action directly affecting the content, substance, and parameters of the CAP Update; that pre-decision was made without CEQA analysis or compliance, and outside the context of any sufficiently noticed or transparent public process. Further, this action was taken after release of the CAP Update's NOPs issued on December 10 and December 23, 2020 and, therefore, is not disclosed in the NOPs. The consequence of this timeline is that, absent participation in the

County's virtual scoping meeting on January 28, 2021, interested stakeholders likely do not know of this significant pre-decisional policy direction on the CAP Update.

In addition to the above concerns, the meaning of Minute Order No. 5 itself is vague and ambiguous because of its abbreviated length and the absence of any discussion regarding whether this direction is limited to the four corners of the CAP Update or also extends to the CEQA analysis prepared for any proposed project under the County's jurisdiction. For example, does the Board order limit the GHG reduction strategies that will be identified in its CAP Update (and any subsequent projects that tier from or streamline their environmental analysis pursuant to the CAP)? Does the Board's order mean that the County will not allow the purchase of carbon offsets as an acceptable tool for reducing GHG emissions, even though authorized by CEQA and other laws and regulations? Will this new policy direction be applied in an expansive context outside of the CAP framework, such that the applicants of ministerial and discretionary projects processed by the County will be prohibited from purchasing carbon offsets? How will previously approved projects with certified EIRs specifying carbon offsets as their GHG mitigation be handled in light of this new Board policy? **We need to understand whether the County is eliminating the purchase of carbon offsets as a tool from the toolbox of acceptable GHG mitigation strategies set forth in CEQA Guidelines section 15126.4(c). If so, we need the CAP Update and Draft Supplemental EIR to thoroughly explain the basis for such a decision.**

As such, **we specifically request that the County articulate its reasoning for pursuing this policy direction in the CAP Update, as Minute Order No. 5 is not accompanied by any substantive basis for or elaboration on its direction.** We note that the Fourth District Court of Appeal, when issuing its decision on the County's last CAP, expressly admonished that its "decision is not intended to be, and should not be construed as [a] blanket prohibition on using carbon offsets — even those originating outside of California — to mitigate GHG emissions under CEQA." Further, there has been no change in course from the California Air Resources Board, which continues to permit the use of carbon offsets: (i) under its Cap-and-Trade Program for regulated, stationary source entities; and (ii) when reviewing proposed AB 900 projects for CEQA streamlining purposes. CARB also affirmed the purchase and use of carbon offsets for the Newhall Ranch project in Los Angeles County in 2017, and identified the use of carbon offsets in its Scoping Plan as a complementary means to reduce GHG emissions from new development when coupled with other feasible on-site reduction strategies. In light of this legal context, please provide the Board's substantive basis for precluding the use of carbon offsets. We also would prefer that this explanation be provided and publicly distributed for public comment before completing the Draft Supplemental EIR for the CAP Update.

In lieu of arbitrarily directing the wholesale elimination of carbon offset use, we request the County focus on developing criteria and standards for their use. Carbon offsets have a well-established history of environmental integrity and effectiveness and provide meaningful opportunities to achieve GHG reductions that benefit the global balance sheet of GHGs outside of the limited geography of the County's unincorporated areas. No evidence has been presented that purchased carbon offsets are systemically

failing when the underlying activities are implemented pursuant to scientifically-vetted and registry-approved quantification protocols and methodologies. As such, there is no "stigma" associated with purchased carbon offsets, despite the insinuations of the County Board of Supervisors' Minute Order No. 5.

Moreover, this direction — which appears to be a matter of an undisclosed and unsubstantiated policy preference — has environmental, economic and planning ramifications that have not been subject to any transparent form of analysis prior to the January 13, 2021 action. As such, **we request that the CAP Update and its Draft Supplemental EIR evaluate all environmental, economic, and planning implications of eliminating carbon offsets as a GHG reduction strategy**. Some related, preliminary questions that come to mind and need to be answered include those that follow:

- Will the County be able to meet its own GHG reduction targets for the CAP Update in the absence of carbon offsets? In a *Voice of San Diego* article published on January 12, 2021 ("County's New Climate Plan Could Use the System That Doomed the Old Plan"), when asked whether the County will need to use carbon offsets to achieve its GHG targets, Ms. Bray's commentary indicates that the decision to prohibit the purchase of carbon offsets at this very early juncture in the CAP Update process, at the very least, was premature. We agree that it is premature to eliminate carbon offsets as a GHG reduction tool and ask that the Board rescind Minute Order No. 5.
- Will it be feasible for proposed development projects to achieve net zero GHG reduction targets, which have been supported by the California Air Resources Board and others (including the County), in the absence of carbon offsets and after accounting for all existing and reasonably foreseeable constraints?
- What is the cost per metric ton of GHG reduction achieved through the use of carbon offsets as compared to other strategies that are identified by the County for implementation in its CAP Update? If the cost of other strategies is substantially higher, how will this impact the cost of housing?
- Does prohibiting the use of carbon offsets interfere with or obstruct the County's ability to deliver the requisite number of housing units?

Also, because the policy decision to eliminate carbon offsets was made outside of the CAP Update process and with no notice or opportunity for meaningful input, **we request that the Draft Supplemental EIR for the CAP Update include an alternative that permits the continued use of carbon offsets as a GHG reduction strategy**.

We also strongly encourage the County to consult with carbon offset registries as important stakeholders in this process. We particularly encourage consultation and outreach to Craig Ebert, President of the Climate Action Reserve. While the rhetoric around the critique of carbon offsets has been fervent in the San Diego region, the science to support the critique has not. The County Board of Supervisors should fully educate itself on carbon offsets before writing them off.

2. To the extent that the County proceeds with the wholesale elimination of purchased carbon offsets as a matter of policy, **we request that the County commit to developing an agency-administered plan or program to achieve the Board of Supervisors' GHG reduction objectives**. This plan or program must be supported by a fair-share and nexus study that is prepared prior to or concurrent with adoption of the CAP Update, so that the CAP Update is defined with sufficient specificity and supported by evidence establishing it will be a workable approach subject to successful implementation. In other words, we implore you to take this opportunity to develop a GHG mitigation program for use by individual projects that is akin to the way jurisdictions tackle school, park, and transportation impacts (by way of example), whereby projects can provide fair-share funding to the County for the off-site reduction of GHG emissions through improvements, activities, and programs administered by the County.

   We underscore that it is not feasible to assign individual landowners or developers with the burden of establishing and implementing in-County GHG reduction activities that are not located on their project sites. Such activities cannot be accomplished by landowners/ developers in a successful manner within a reasonable period of time, and after accounting for economic, social, and legal factors. The complexity of such an endeavor is illustrated by the following, preliminary recitation of steps that would have to be undertaken by each individual landowner/developer in connection with each individual land use project:

   - Identify potential off-site locations in the County that are likely under different ownership, and survey such locations for potential GHG reduction opportunities;
   - Evaluate the constraints of each off-site location and the preliminary magnitude of GHG reduction potential;
   - Negotiate the legal rights necessary to make GHG reduction improvements at such off-site locations;
   - Work with GHG reduction project developers to utilize existing and/or create new types of reduction activities;
   - Create quantification methodologies and protocols for the specific type of reduction activity that are scientifically vetted and supported by substantial evidence;
   - Negotiate contractual terms required to implement such reduction activities;
   - Administer and fund such activities;
   - Accomplish each of the steps outlined herein prior to issuance of grading and building permits to ensure that the GHG emission reduction is timely and not late; and
   - Undergo administrative review, CEQA review, public hearings, and approval by an agency with jurisdiction over the off-site GHG reduction activity location(s).

   This onerous process is one of the reasons that traditional carbon offsets have proven to be such a useful mitigation tool when reducing project-related GHG emissions. Purchased carbon offsets allow for individual projects to address their GHG emissions in a real and

effective manner while recognizing that landowners and developers are just that — landowners and developers and not off-site GHG reduction project developers.

3. At a time when the San Diego region and the State of California at large are in the midst of a well-documented housing crisis, it is critical that the CAP Update set forth an approach to GHG reduction that is compatible with achievement of the County's housing targets, including those set forth by SANDAG's RHNA, and the approved land use framework of the County's existing General Plan. Therefore, **please confirm — in the evidentiary record for the CAP Update — that the GHG reduction strategies and approaches set forth therein will not interfere with the timely delivery of all types of housing for all income levels in the County**.

4. **Please confirm that the modeling parameters for the GHG inventories and forecasts accurately reflect the land use framework of the General Plan's Land Use Element**. To facilitate this confirmation exercise, and in addition to the County's own independent review, all applicants of approved (but not yet fully built) and proposed land use development projects should be notified by the County of the CAP Update process and solicited to review and provide input on the "Land Use Overlays" posted at https://www.sandiegocounty.gov/content/sdc/sustainability/climateactionplan.html. The GHG inventories and forecasts being developed for the CAP Update only are as credible as the assumptions that go into them. Shortcuts must not be taken with respect to identifying the correct land use inputs.

5. As shown on Slide 10 of the County's Virtual Scoping Meeting presentation, GHG emissions from on-road transportation sources were 45% of the baseline inventory in the last CAP. During the January 28, 2021 scoping meeting, County staff indicated that a similar percentage is expected in conjunction with the CAP Update's inventory work. In proceeding with this CAP Update, **we request that the County use modeling assumptions for on-road transportation sources that are consistent with and based on achievement of California's zero emission vehicle (ZEV) penetration targets**. A host of statewide policy and programming has been developed to facilitate ZEV turnover, and this CAP Update should not rely on outdated assumptions regarding the type of vehicle utilized to meet the San Diego region's passenger vehicle demand. We believe this is a reasonable approach, particularly when considering the policy agenda of the Biden Administration and its clear focus on combatting climate change and pursuing green innovation.

6. **We request that the CAP Update process establish CEQA review criteria for both General Plan consistent projects and General Plan amendment projects**. While it is our understanding that the primary purpose of the CAP Update is to mitigate the GHG emissions of the General Plan-approved land use framework, the County should be forward-looking and establish a workable framework for General Plan Amendment (GPA) projects that allows such projects to demonstrate consistency with the CAP Update upon certain conditions being met. The foreseeability of GPA projects is affirmed by the Planning and Zoning Law, which recognizes that the passage of time and changing conditions necessitate amendments to the approved land use framework. Conversely,

effectively locking the County's General Plan land use framework in stone and precluding GPAs by policy or outright is not only a violation of state law, it would impede the County's ability to address existing infrastructure and public service deficiencies, causing significant socioeconomic harm to many of the County's unincorporated communities.

7. **It also is imperative that the CAP Update be accompanied by an economic impact analysis and cost-benefit analysis that study the ramifications of the policy choices made therein on every impacted business sector, including housing**. We must carefully balance the need to combat climate change with the avoidance of unbearable impact to the economy, so as to ensure that the San Diego region remains strong and vibrant while aggressively pursuing important environmental policy.

8. **The CAP Update should also demonstrate consistency with the County General Plan's Guiding Principles, Goals and Policies, and other General Plan Elements.** Specific to the Housing Element and affordable housing policy, if the County will also be developing a strategy for creating affordable housing (e.g., an inclusionary housing or workforce housing program) and updating the Housing Element as a result, it is essential that the CAP Update, specifically the GHG mitigation strategies, can be shown to not impede or preclude implementation of the County's affordable housing objectives.

9. During yet another recent meeting of the County Board of Supervisors, staff was directed to "develop a framework for a regional zero carbon sustainability plan in partnership with [UCSD] which shall include strategies and initiatives to achieve zero carbon in the region by 2035." (County of San Diego Board of Supervisors, Wednesday, January 27, 2021, Minute Order No. 3.) **The County must provide further information and clarity on the relationship between this regional sustainability planning effort and the CAP Update**.

    - For example, Minute Order No. 3 on the regional sustainability plan refers to achievement of "zero carbon in the region by 2035." However, Minute Order No. 5 on the CAP Update discussed above refers to "net zero carbon emissions by 2045." Are "zero carbon" and "net zero carbon" the same thing? If not, how are they different? If the same, why are two different calendar years referenced?

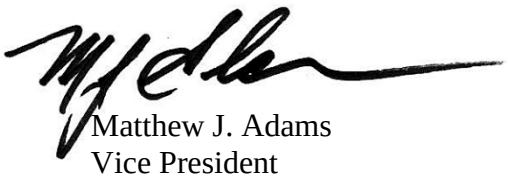
10. As with any planning effort, we request that the County **continue to process existing applications for land use development**. The CAP Update should not trigger limbo for pending projects, which should continue to be processed and reviewed per existing, applicable rules and standards. This is especially the case because, as reflected on Slide 16 of the County's Virtual Scoping Meeting presentation, the County's CAP Update process likely will not be completed until the end of the 2022 calendar year.

    We also underscore the importance of continuing to honor and uphold the use of carbon offsets by previously County-approved projects. It appears that the County Board of Supervisors is in the midst of pursuing a policy shift, but not one based on evidence or analysis showing that carbon offsets are ineffective at or fail to reduce GHG emissions. As such, pre-existing approvals cannot be abandoned or thrown under the bus.

In closing, the BIA is conceptually supportive of a CAP Update that provides: (i) for the equitable and meaningful reduction of GHG emissions under the County's jurisdiction, and (ii) workable mechanisms to streamline the environmental review of proposed development projects, while simultaneously creating a flexible framework that recognizes the site-specific constraints and opportunities of land use development. To that end, we look forward to partnering with the County as it proceeds with the CAP Update and request that the County engage with the building industry as it proceeds to evaluate the feasibility of different GHG reduction strategies and measures.

Thank you for your consideration of this letter.

Very truly yours,



Matthew J. Adams
Vice President
Building Industry Association of San Diego County

cc: County of San Diego Board of Supervisors
Sarah Aghassi, Deputy Chief Administrative Officer
Kathleen Flannery, Acting Director, Planning & Development Services
Michael De La Rosa, Program Manager, Planning & Development Services

From:	Bill Tippets
To:	CAP
Cc:	Mike McCoy
Subject:	NOP for the County"s Climate Action Plan
Date:	Wednesday, February 3, 2021 4:49:28 PM
Attachments:	County_CAP_2021_NOP comments.pdf

County of San Diego -

Attached are comments from the Southwest Wetlands Interpretive Association (SWIA) to be included in the public comments/record for the NOP.

Because the previous CAP and its EIR were found to be inadequate by the courts, we strongly urge the County to incorporate the recommendations in our and other environmental groups' letters regarding the NOP.

Sincerely,

Bill Tippets (Secretary, SWIA Board of Directors)

SWIA

700 Seacoast Drive, Suite 108
Imperial Beach, CA 91932

February 4, 2021

County of San Diego Planning & Development Services
5510 Overland Avenue, Suite 310
San Diego, CA 92123

Attention: Kelly Bray CAP Project Manager

Electronic copy sent to: CAP@sdcounty.ca.gov

Subject: Notice of Preparation for a Supplemental EIR for the County of San Diego Climate Action Plan, Environmental Review Number PDS2020-ER-20-00-002

Dear Ms. Bray and County Planning:

The Southwest Wetlands Interpretive Association (SWIA) is an environmental organization established over 40 years ago whose mission is to conserve wetlands and other sensitive natural habitats, primarily in San Diego County and southern California. We are submitting these comments on the County's proposed Climate Action Plan (CAP) and associated amendments General Plan Update. Our organization is extremely concerned about how jurisdictions are addressing climate change and in particular how they plan to reduce greenhouse gas (GHG) emissions, which exacerbate sea level rise that threatens coastal shorelines and wetlands and have overall negative impacts on many natural habitats and species.

INTRODUCTION AND BACKGROUND

SWIA has actively engaged in and supported the preparation of Climate Action Plans (CAPs) throughout San Diego County. We commented on the earlier versions of the CAP and provided

recommendations to make them consistent with state requirements and 2011 GPU obligations (our letter dated February 8, 2018, addressed the now-rescinded 2018 CAP and SEIR).

As the County prepares its new CAP to comply with CEQA, we believe that our previous recommendations regarding establishing a credible GHG emissions baseline, inventory, and projections; additional or revised mitigation measures that will be implemented and achieve their intended outcomes; as well as the need to clarify and commit to effective monitoring (with concomitant adaptive management to address identified failings to achieve the mitigation and targets) are relevant and should be addressed.

Our comments are consistent with concerns and recommendations provided by numerous other environmental groups, in particular the Sierra Club San Diego Chapter's letter of January 12, 2021.

SPECIFIC COMMENTS

GHG Baseline, Inventory, Projections, and Targets

It is essential that the CAP acknowledge and apply the most current state (and relevant regional and federal) laws, regulations, policies and practices to establish the GHG baseline, inventory, projections and targets. In particular, the CAP must incorporate the goals of Executive Order B-55-18 to Achieve Carbon Neutrality by 2045, and SB 32 and EO S-3-05, which set statewide emissions reductions targets at 40% below 1990 levels by 2030 and 80% below 1990 levels by 2050. And the County CAP should achieve, wherever relevant and feasible as a mitigation requirement, "net negative 100% GHG emissions," as described in the Sierra Club letter.

The County must not rely on inappropriate data sets and assumptions when preparing its baseline, inventory or projections, which has been identified to be a problem for the City of San Diego (https://www.sandiegouniontribune.com/opinion/editorials/story/2020-12-31/editorial-heres-glorias-first-misstep-as-mayor-using-bogus-data-for-greenhouse-emissions). And it must use the most appropriate (and legally required) GHG reduction targets - and preferably the carbon neutrality goal- as the basis for preparing its GHG avoidance, minimization and mitigation measures. GHG emissions have both short-term as well as long-term effects on many of the to-be-analyzed subject areas listed in the NOP, so the County must establish clear and well-justified thresholds of significance.

Transportation

Transportation constitutes the largest sector of GHG emissions and poses the greatest potential complication to preparing and implementing a credible CAP. As we noted for the previous CAP, the County's previous approaches have not sufficiently altered vehicle use and reduced vehicle-based GHG emissions. Furthermore, the County in 2020 adopted a seriously flawed SB 743 VMT reduction plan that would potentially allow over 50% of its future development to avoid VMT analysis – and that has serious GHG emission consequences (SWIA letter dated June 8, 2020). In addition, SANDAG is preparing its 2021 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) that purportedly will establish a higher SB 375 GHG reduction target (30%) compared to the 19% that it had previously established. The County's CAP must described how it will align with and be consistent with that new target. Finally, the County has almost without exception approved major subdivision projects using the GPA process, although those projects do not conform to the 2011 General Plan Update, generate vast amounts of transportation-based GHG emissions (predominantly from single occupancy vehicles), and all of them have relied on and required the purchase of unproven/unjustified offsite mitigation credits (from essentially anywhere in the world). Because GPAs are not consistent the 2011 GPU nor are their impacts known, how will the County ensure conformance to the CAP? All of these concerns must be fully addressed and all potential impacts avoided or appropriately mitigated to a level of not significant in the CAP.

Energy

The energy used in commercial, industrial and residential buildings is the second-largest GHG emissions sector. While the County included many reasonable and feasible GHG emission reduction measures in its 2018 CAP, GHG emissions from the built environment (buildings) and future development still pose a significant potential impact. A primary commitment of the CAP should be the adoption of Community Choice Aggregation/Energy program, whether a stand-alone or a part of the emerging CCA that the City of San Diego and other cities are pursuing, to maximize the use of 100% clean energy (zero carbon emissions) by existing, redeveloped, and new buildings by 2035.

As noted in the preceding section, the location of building(s) can have a significant transportation GHG emission footprint effect. The vehicle/transportation-related GHGs for buildings, as well as their inherent GHG emissions (construction and operation/use), calculated over the anticipated life of the building/residence (e.g., 50-100 years), must incorporate and fully analyze their impacts.

The County should also establish and implement a program for energy audits for all buildings that are sold or significantly modified to ensure that their GHG emissions are fully known and appropriate emission reductions are required to align with meeting the County's GHG emission reduction targets for the sector.

Other Concerns

The County previously identified "Direct Investments" as a mitigation measure for County operations. This was essentially a list of possible GHG reduction projects the County would invest in to offset a share of County operations' GHG emissions. Speculative, non-specific (in terms of both the scale of projects and their locations) actions pose a significant problem in terms of how to analyze their potential impacts if/when implemented. The CAP must provide more clarity (and perhaps a decision chart) to adequately address potential impacts.

As a conservation organization whose primary purpose is to advocate and implement (primarily wetland) habitat preservation, enhancement and restoration, we would strongly oppose CAP elements/measures that impact sensitive habitats and species – and in particular, any existing or identified future conservation lands. However, if the CAP chooses to propose GHG emission reduction measures that rely on natural lands, such as enhancing carbon capture or establishing carbon credit banks, then the balance of impacts and benefits must be clearly and quantitatively evaluated and found to be a net benefit (e.g., net negative GHG emissions) and not to impact habitat values and species.

The CAP should avoid reliance on offsite, out-of-County carbon credits, except where no other on-site/in-County alternatives exist. Even then, use of out-of-County credits should be limited to a small percentage (e.g., less than 10%) of any project's mitigation.

Climate change has been demonstrated, repeatedly, to disproportionately affect disadvantaged communities. The CAP must ensure that those communities are a priority for GHG emission reductions and utilize the most effective and implementable mitigation measures.

Our contact to discuss these comments and recommendations is Bill Tippets (billtippets@gmail.com).

Sincerely,

Michael A. McCoy, President

Bill Tippets, Board Member

From: Frank Landis
To: CAP
Subject: Re: CNPSSD Comments on CAP NOP
Date: Thursday, February 4, 2021 10:11:58 AM
Attachments: CNPSSD comments on CAP NOP 20210204.pdf

Dear Ms. Bray,

Attached are the CNPSSD comments on the CAP NOP. Please let me know if you can open and read them. Please also keep CNPSSD informed of developments on this program, at conservation@cnpssd.org.

I look forward to a working Climate Action Plan. Best of luck!

Stay safe,

Frank Landis, PhD
Conservation Chair
CNPSSD

California Native Plant Society

San Diego Chapter of the California Native Plant Society
P O Box 121390
San Diego CA 92112-1390
conservation@cnpssd.org | www.cnpssd.org

February 4, 2021

County of San Diego
Planning & Development Services
Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, CA 92123
CAP@sdcounty.ca.gov

RE: San Diego County Climate Action Plan Notice of Preparation PDS2020-POD-20-016 and PDS2020-GPA-20-004

Dear Ms. Bray,

We appreciate the opportunity to comment on San Diego County's Climate Action Plan (CAP), Notice of Preparation (NOP). The San Diego Chapter of the California Native Plant Society (CNPSSD) works to protect California's native plant heritage and preserve it for future generations. CNPS promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices.

The comments provided here have four bases:

- CNPS policy that climate change is an existential problem for native plants
- My (Landis) background as a botanist and environmental scientist,
- Our organizational experience with planning stretching to well before the current General Plan update was adopted, and
- Experience with the last attempt at a CAP, and with commenting on EIRs written under its aegis.

To that end, we have grouped these comments into a discussion of issues to consider when creating the CAP, and material we want to see in the CAP. Our goal is for the County to not just to create a document entitled "Climate Action Plan," but for San Diego County to physically go carbon neutral by 2035, 2045 at the latest, and sequester more greenhouse gases than it produces thereafter.

Currently we as a culture are following the worst case model for carbon emissions, Without radical action to stem greenhouse gas emissions, San Diego County, if it still survives as an entity by 2100, will likely house considerably fewer people than it does now, due to infrastructure breakdown caused by climate change. Only nihilists want such a future, and that category does not include us.

Creating the Climate Action Plan

The following comments are presented in no particular order.

First, extend the timeline for the CAP from 2050 to at least 2100, or for the lifespan of all projects permitted under it, whichever is longer. The reason for this is that most of the building projects now under County consideration implicitly or explicitly have at least 50 year lifespans. If they are permitted now (2021) and take a decade to build (until 2031), their expected end of service is 2081. The Otay Hills Aggregate Mine, currently under consideration, explicitly plans petroleum-based operations until 2115.

The CAP needs to be in force for the lifespan of the projects permitted under it. To do otherwise, as shown in some EIRs in the last five years, is to have projects put off issues until after the end of the CAP as a way to avoid mitigating for them. It is simpler for everyone, and cheaper for the County, to insist that any development plan for the lifespan of the project be covered by this Climate Action Plan or its successors.

Second, insure that the Climate Action Plan is consistent with other plans and projects at the local, regional, state, and federal levels. This is especially important with regards to the North and East County MSCPs, the County Sustainability Plan, and efforts to streamline renewable energy projects, because these are all being developed more-or-less concurrently. Planning should take care to insure these are all completely consistent with each other.

But do not stop there. The CAP needs to work with a number of other plans and processes. A partial list of plans follows:

- The County Sustainability Plan should be completely consistent with the CAP. They need to share common goals, timelines, and actions.
- The MSCPs. Since the County requires every useful carbon sink it can obtain and protect, it may be worth considering whether wetlands, riparian areas, woodlands, and forests all deserve protection under both the CAP and MSCP. Equally important, neither program should require efforts that damage the other. For example, carbon sinks should not blindly be destroyed in restoration efforts for sensitive species, nor should efforts to sequester carbon put species at further risk of extinction.
- Efforts to streamline renewable energy projects should not impede CAP goals. While renewable energy is needed, this is not carte blanche to destroy carbon sinks or impede other CAP goals.
- Any updates to the Resource Protection Ordinance and the Grading Ordinance also need to take into account the County and State goals of achieving carbon neutrality. In particular, riparian and wetland features need to be protected, due to their value as carbon sinks.
- Local, state, and federal wildfire control plans. Wildfires are increasingly a threat, partially due to climate change, so one part of dealing with the threat is decreasing greenhouse gas concentrations in the air. However, vegetation often needs to be cleared to make buildings and people safer. Therefore, the CAP writers and regulators need to work with CalFire, Fire safe districts, and fire ecologists to make sure that both fire safety and greenhouse gas reductions are met.
- Community Plan Updates. As an example, the Alpine Community Plan Update SEIR predicts substantial and unmitigable impacts to climate as part of the community's growth. Why should any community be allowed to cause this impact, when all communities are being required to avoid and mitigate it? This is contrary to the *Newhall Ranch* ruling. All

community plans should be required to meet the goals of the CAP and the Sustainability Plans. Climate change is an existential threat to San Diego County. Any gains that increase emissions are at best temporary.

- Plans for expanding carbon-farming by the farm board and others in the agricultural industry.

Third, train all planners, consultants, Planning Commissioners and Supervisors to read calendars and add and subtract dates. My apologies for being snarky, but as a "watchdog" activist who reads many EIRs, I am appalled at the widespread inability of planners to read calendars and add years. EIRs have been passed on all levels (right into litigation) that use an achronological calendaring, where, among other things, carbon emitted now is dealt with decades after it should be naturally taken into the ocean, projects simultaneously take a decade or more to build and are ready the next year, and so forth. Planners need to create a multi-decade calendar with CAP deadlines to meet. Project proponents need to be required to be explicit and honest about the planned lifetime of their projects, and project life cycles and impacts need to be explicitly described on calendars to determine if they will help or hinder the County's ability to meet its climate goals.

Fourth, establish boilerplate language for EIRs that contains all the federal, state, and local laws, regulations, and plans, and litigation consequences that apply to any County projects. It is frustrating to me as an EIR commenter when I can add pages of comments on an EIR by simply copying and pasting the climate change regulation section from another EIR, then asking why this material was not included in an EIR, especially when the two EIRs are written by the same firm and both overseen by County Planning. This strongly suggests that County Planning does not have a consistent set of regulations or a timeline under which it works with project proponents to meet climate action goals.

That master regulatory framework needs to be constructed and regularly updated, because consultants are not doing the job well enough. Such a framework will actually simplify everybody's job (planners, consultants, commenters, and decision makers), because a well-constructed regulatory framework means that everybody has reason to agree what goals need to be met when, and why, and projects can be planned and judged accordingly. I suggest that the first version of it be included in the Climate Action Plan itself.

Fifth, the CAP should analyze and ideally help provide for the cost of controlling invasive non-native pests that affect carbon sequestration project. The current example are the shothole borers (*Euwallacea* spp.) that can infest dozens of tree and shrub species. Due to their peculiar biology, they are prime candidates for biological control. Entomologists spent over a year seeking the $10 million needed to test and release three bio-control species, but struggled because the shothole borers were not clearly covered by any existing program. Meanwhile, Los Angeles County estimated that it would take billions of dollars to properly dispose of all the trees killed by the borers.

This is not an isolated problem, as APHIS (the US Animal and Plant Health Inspection Service) estimates that a new pest or pathogen shows up a US ports every week. Although most fail to establish, occasionally one does, and by 2050, one estimate is that international trade will have moved every possible pest to every possible host.

Since the success of the CAP will depend in large part on sequestering carbon in plants or soil and keeping it out of the atmosphere for at least a century, protecting the plant and soil health is vital. The costs of things like biological controls are far, far cheaper than the cost of losing sequestered carbon to pests and then having to pay to properly dispose of the mess.

Therefore, as a cost and project-saving measure, we strongly urge the County to consider pest control as part of the CAP, as a way to protect carbon sequestration.

Sixth, work with the Farm Bureau and San Diego agriculture community to develop carbon farming as a viable strategy for the CAP. Theoretically, carbon farming is probably the biggest carbon sink in the County. Unfortunately, its potential is not known, nor are its requirements for scarce resources like water. The CAP must create a system for developing this sector and generating realistic data and projections for how much carbon can be sequestered for decades to centuries by area agriculture.

This is an iterative, developmental process, and we strongly recommend that the CAP treat it such, as a system to be developed through adaptive management and regular CAP updates.

Seventh, make it clear to every project proponent that they are not special, and do not deserve an exemption from the CAP any more than anyone else does. Too many project proponents appear to think that their project is too special or necessary to be limited in the greenhouse gases they produce. Unfortunately, the County has limited facilities for carbon sequestration, and the only way to achieve the goal of carbon neutrality is for everyone to do their part. It should also be obvious that it will be easier for new projects to create carbon-neutral designs than it will be for existing buildings and infrastructure to rebuild and retrofit. Therefore, new projects, per the *Newhall Ranch* ruling, need to be required to shoulder a greater share of emissions reductions and sequestration.

Within the Climate Action Plan

First, we believe that the NOP was overly restrictive in the following statement: "the project will include amendments to Goal COS-20 and Policy COS-20.1 of the General Plan and 2011 GPU PEIR Mitigation Measures CC-1.2, CC-1.7, and CC-1.8, similar to the 2018 CAP. Policy COS- 20.1 was also amended in 2018 so that the CAP could be used in the analysis of cumulative GHG impacts of projects covered by the CAP." **All of these can be usefully updated. We make suggestions on how to do this below.**

Goal COS-20 Governance and Administration. Reduction of local GHG emissions contributing to climate change that meet or exceed requirements of the Global Warming Solutions Act of 2006. This should be changed to be consistent with either the County Sustainability Goal of being carbon neutral by 2035, and the Executive order B-55-18 statewide goal of being carbon neutral by 2045.

Policy COS-20.1 Climate Change Action Plan. Prepare, maintain, and implement acclimate change action plan with a baseline inventory of GHG emissions from all sources; GHG emissions reduction targets and deadlines, and enforceable GHG emissions reduction measures. This proved contentious in the previous CAP. We suggest focusing on working towards carbon neutrality (e.g. zero) rather than as a percentage of past emissions. With that goal, current and updating inventories is more useful than arguing about past emissions.

CC-1.1 Update the County Green Building Program to increase effectiveness of encouraging incentives for development that is energy efficient and conserves resources through incentives and education. Two updates might be useful. One is to find ways to incentivize retrofitting

existing buildings to be greener. A more important update is to help developers understand how to use site planning (such as lot shape and subdivision), building orientation, and building and landscaping design combined to maximize solar energy gain and minimize energy requirements. The latter comment reflects the unfortunate reality that, although both architects and landscape architects are taught to do this, developers seldom use these talents. They obviously need guidance to do so. We suggest promoting a paradigm of buildings designed to be sustainable whose aesthetic appeal is then enhanced by the architects' talents, rather than the current paradigm of aesthetically-designed homes where sustainability is mostly an afterthought.

CC-1.2 Prepare a County Climate Change Action Plan with an update baseline inventory of greenhouse gas emissions from all sources, more detailed greenhouse gas emissions reduction targets and deadlines; and a comprehensive and enforceable GHG emissions reduction measures that will achieve a 17% reduction in emissions from County operations from 2006 by 2020 and a 9% reduction in community emissions between 2006 and 2020. Once prepared, implementation of the plan will be monitored and progress reported on a regular basis. As noted above, the CAP should be a plan for how the County goes carbon neutral, with net zero emissions. It needs regular emissions inventories and air chemistry measurements to help it meet this goal.

CC-1.3 Work with SANDAG to achieve regional goals in reducing GHG emissions associated with land use and transportation. This should be updated in line with SANDAG's current proposals.

CC-1.4 Review traffic operations to implement measures that improve flow and reduce idling such as improving traffic signal synchronization and decreasing stop rate and time. This is a short-term measure. The longer-term measure is to enable the conversion to an electric vehicle fleet, and to incentivize and help build the infrastructure needed. This includes changes to the power grid, changing regulations to favor more charging stations and batteries, and helping gas stations switch away from gas as technologies become available.

CC-1.5 Coordinate with the San Diego County Water Authority and other water agencies to better link land use planning with water supply planning with specific regard to potential impacts from climate change and continued implementation and enhancement of water conservation programs to reduce demand. Also support water conservation pricing (e.g., tiered rate structures) to encourage efficient water use. In addition, we note that riparian areas, wetlands, and seagrass meadows are probably the best carbon sinks available in the County. Therefore water resources, from reservoirs to stormwater outflows, need to be managed so that these scarce areas are restored and expanded, not further degraded.

CC-1.6 Implement and expand County-wide recycling and composting programs for residents and businesses. Require commercial and industrial recycling. While this needs to be done, there are complexities that must be addressed in the handling of compost. One issue is where the mulch currently goes, especially if it is used for daily or alternative daily cover on local landfills. If mulch is diverted from this use, something else (which is likely more expensive) needs to take the place of mulch as landfill cover. Without it, dust and odors coming off the landfills become a more serious problem.

Second, about one-third of California counties, including San Diego, are under agricultural quarantine by the State Department of Agriculture for serious pests, some of which survive hot composting. If County-scale composting facilities are planned, great care must be taken that these facilities don't turn into pest and pathogen superspreader stations, where infected material comes in and gets spread throughout San Diego or other fields. Therefore, the County needs to work with the agricultural community and CDFA to beef up quarantine and compost procedures as compost processing ramps up, to maintain good sanitary practices and not accidentally destroy the San Diego's agricultural industry, or further spread pests that will wipe out native oaks and other species.

CC-1.7 Incorporate the California ARB's recommendations for a climate change CEQA threshold into the County Guidelines for Determining Significance for Climate Change. These recommendations will include energy, waste, water, and transportation performance measures for new discretionary projects in order to reduce GHG emissions. Should the recommendation not be released in a timely manner, the County will prepare its own threshold. We recommend ongoing collaboration with the ARB to reach net zero greenhouse gas emissions.

CC-1.8 Revise County Guidelines for Determining Significance based on the Climate Change Action Plan. The revisions will include guidance for proposed discretionary projects to achieve greater energy, water, waste, and transportation efficiency. These should also include guidance for achieving net zero emissions over the lifespan of the project.

CC-1.9 Coordinate with APCD, SDG&E, and the California Center for Sustainable Energy to research and possibly develop a mitigation credit program. Under this program, mitigation funds will be used to retrofit existing buildings for energy efficiency to reduce GHG emissions. It is worth updating this list of partners and perhaps the entire concept of mitigation schemes to reach net zero emissions.

CC-1.10 Continue to implement the County Groundwater Ordinance, Watershed Protection Ordinance (WPO), Resource Protection Ordinance (RPO), MSCP and prepare MSCP Plans for North and East County in order to further preserve wildlife habitat and corridors, wetlands, watersheds, groundwater recharge areas and other open space that provide carbon sequestration benefits and to restrict the use of water for cleaning outdoor surfaces and vehicles. The WPO also implements low-impact development practices that maintain the existing hydrologic character of the site to manage storm water and protect the environment. (Retaining storm water runoff on-site can drastically reduce the need for energy-intensive imported water at the site.). Agreed. These plans all need to be consistent and work together.

CC-1.11 Revise the Ordinance Relating to Water Conservation for Landscaping to further water conservation to:
•Create water-efficient landscapes and use water-efficient irrigation systems and devices, such as soil moisture-based irrigation controls.
•Use reclaimed water for landscape irrigation.
•Restrict watering methods (e.g., prohibit systems that apply water to non-vegetated surfaces) and control runoff.
•Provide education about water conservation and available programs and incentives.

We strongly suggest adding water-efficient native plants to the mix. If properly chosen, these also provide food and nesting habitat for birds, pollinators, and other beneficial wildlife, and some can be more fire resistant than non-native dryland plants. CNPS has had great success with bringing in water-smart native plants to commercial and residential landscapes in Orange and Los Angeles Counties, and we would be happy to discuss bringing the program to San Diego.

Other suggestions include:

First, please include the California Solar Shade Act of 1974 (PRC Div. 15, Sec 12, 25980-25986) in the CAP. The point here is that trees shouldn't be planted on the south side of solar panels, especially when they are big enough to grow to block the sun, and most especially in new developments. While this sounds trivial, in the sprawl developments I reviewed over the last few years, almost all had street trees planted south of solar panels somewhere. What happened was that neither streets nor property lines were laid out to maximize roof exposure to south or west (for optimal solar energy generation), roofs were not designed to maximize solar energy uptake, and worst of all, landscape architects and building architects obviously did not communicate, for street trees inevitably blocked some solar arrays.

This gets to a fundamental point: developments of any size that generate their own energy have to be designed for this purpose from the ground up, and the design has to include the landscaping. This *requires* that the developer insure that all the architects and engineers talk with each other, and together work to design properties that emit no greenhouse gases. All the professions are trained to deal with these issues, but without a manager making sure they work together, they do not. This has to change, and the CAP needs to make this a priority.

Second and in the same vein, greenhouse gas reduction must be compatible with wildfire threat mitigation. This goes for both wildfire evacuation and brush management.

As noted in the previous comment, experts need to be required to work with each other. I have seen multiple instances where wildfire evacuation plans assume that cars can move at fairly high speeds to evacuate during wildfires. In the same document, greenhouse gas mitigations call for multiple "traffic calming" measures, like speed bumps, narrow streets, and curving lanes, to slow down traffic and thereby curb GHG emissions. These requirements are mutually exclusive, but not only did no one catch them, no one was willing to fix them and the issues are now in litigation.

So far as brush management goes, a development cannot set aside vegetation as a carbon bank and simultaneously clear it annually as a fire break. The experts working to sequester carbon, the experts working to conserve species, and the experts working on fire safety have to be mandated to work together on projects, because there is ample evidence that they are rarely asked to do so by developers, planners, or decision-makers. This has to change.

Third, the carbon already stored in standing vegetation and undisturbed soils needs to be accounted for prior to any construction or landscaping. Wildlands normally store carbon in stems, roots, and soil. If a site is bulldozed and the soil is heavily disturbed, all of that carbon will eventually become airborne through decomposition. This site is net emitting carbon, and at best, landscaping will recapture some of what was lost. Some EIRs have claimed that landscaping a bulldozed wildland site counts as sequestering additional carbon. It does not.

The best way the County can work with this is to regularly help fund LIDAR flights that quantify the amount of vegetation in the County and estimate the amount of carbon stored. These numbers should be made publicly available, so that the impacts of developments, droughts, and disasters can be assessed, as can progress towards carbon neutrality.

Fourth, realize that rapid tree growth is not the same thing as superior carbon sequestration. It is also popular to bulldoze old trees because they do not grow as fast as young ones, on the theory that young trees are better at carbon sequestration. This is a simple math failure. For example, a sapling that contains one kilogram of carbon and grows at 100% per year will sequester 1 kilogram of carbon per year. A mature tree that contains 1,000 kilograms of carbon and grows at 2% per year will sequester 2 kilograms of carbon per year. Cutting the mature tree down in favor of a sapling decreases the amount of carbon sequestered by 50%. Rapid growth rate is not the same as optimizing carbon sequestration in each plant. This is why it is so important that the County acquire and maintain biomass and carbon sequestration data on its existing vegetation. This needs to be included in the CAP.

Fifth, make natural gas an option that has to be justified and mitigated for. The base assumption should be that natural gas will not be piped into any project unless there is a pressing need. There are three reasons for this. One is that in residential and most commercial projects, there are already electric equivalents for natural gas appliances, some of which are cheaper and/or better than gas. Second, natural gas, which contains methane, is a more potent greenhouse gas than carbon dioxide. Natural gas emissions are typically the second-highest greenhouse gas emission source in projects after automobiles. Getting rid of natural gas by design is the easiest thing any developer can do to decrease GHG emissions. Third, the County faces a problem of stranded and degrading infrastructure with natural gas. To oversimplify, as people electrify homes and other buildings, they will cut off natural gas at the meter. Increasingly, aging natural gas infrastructure will support fewer users who are more and more scattered. This means there will be less money to repair aging and leaking pipes, and it is highly likely the County will be called on to maintain or remove them, as happened in Detroit and in New Orleans after hurricane Katrina. This is a major future cost for the County. Taking active measures now to limit further installation of natural gas will help ameliorate this cost and decrease GHG emissions.

Sixth, a minor but critical note: incentivize or require home designers to make room for house batteries near main circuit breaker panels. This is a trivial design change, but without it, making room to install a large wall battery can require a major and expensive remodel. In cases where batteries cannot be installed during construction, designing for their future installation saves future costs and incentivizes their later installation. This can be as simple as moving a garage door over a few feet and arranging electrical plugs on a wall so that there is space for a battery.

Thank you for taking these suggestions. Please keep CNPSSD informed of all developments with this project and associated documents and meetings, at conservation@cnpssd.org and franklandis03@yahoo.com.

Sincerely,



Frank Landis, PhD
Conservation Chair
California Native Plant Society, San Diego Chapter

From:	Leilani Commons
To:	CAP; AdvancePlanning, PDS
Cc:	Bray, Kelly; Duncan McFetridge; Easland, Camila
Subject:	Cleveland National Forest Foundation"s Comment Letter on CAP and Housing Study
Date:	Thursday, February 4, 2021 6:50:40 PM
Attachments:	CNFF CAP and Housing Study Comment Letter.pdf

Dear Ms. Bray and Ms. Easland,

Attached is the Cleveland National Forest Foundation's comment letter on the Climate Action Plan and Affordable and Middle-Income Housing Study. The two subjects are interrelated and should not be siloed, so we felt it was appropriate to submit a dual-comment letter.

Sincerely,
Leilani
Planning Intern at Cleveland National Forest Foundation

February 4, 2021

County of San Diego
Planning & Development Services
Attention: Kelly Bray and Camila Easland
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Via CAP@sdcounty.ca.gov and PDS.AdvancePlanning@sdcounty.ca.gov
(858) 505-6445

Re: San Diego County Climate Action Plan ("CAP") Update and Affordable and Middle-Income Housing Study

Dear Ms. Bray and Ms. Easland,

We submit this cover letter and its attached document on behalf of the Cleveland National Forest Foundation ("CNFF") to provide comments on the County's issued Notice of Preparation for the latest CAP update and the County's Housing Study. Both of these interrelated subjects—the Housing and Climate Plans—result in great social and environmental costs when done improperly. These systemic failures occur at both the regional and local community plan level and thus reinforce the problem rather than solve it. On the flipside, the County has tremendous opportunity to achieve climate and housing goals by directing housing towards already urbanized areas.

A perfect example of this compound difficulty is found in the County's recent draft Alpine Community Plan Update ("CPU"). By focusing growth toward undeveloped, rural areas that are not served by transit, the County promotes sprawl and climate disasters. If the County continues to draft community plans like the draft Alpine CPU, it will be literally impossible to meet climate and sustainable growth targets.

Unless the County can contain run-away urbanization with some form of urban boundary by which housing is both concentrated in village centers with increased bike and walk mode share and transfers excess General Plan Housing Units to cities under the San Diego Association of Governments ("SANDAG") Regional Housing Needs Assessment ("RHNA"), the sustainable growth problem remains insoluble.

By all accounts, the San Diego Region is experiencing both a climate and housing emergency. Fortunately, with SANDAG's RHNA, you have a model of what to do for the right reasons and with the Draft Alpine CPU, you have a model of what not to do in this planning emergency.

Please review and consider the following documents as they are integral to our arguments:

- Cleveland National Forest Foundation's Comment Letter on SANDAG's Transportation Network Scenarios for the 2021 Regional Transportation Plan
- Cleveland National Forest Foundation's Comment Letter on Alpine Community Plan Update and Draft Supplemental Environmental Impact Report

Sincerely,



Duncan McFetridge
Director of the Cleveland National Forest Foundation
P.O. Box 779
Descanso, CA 91916
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www.cnff.org
info@cnff.org

From:	Bray, Kelly
To:	CAP
Subject:	FW: County"s NOP and Supplemental EIR
Date:	Friday, February 5, 2021 10:45:01 AM
Attachments:	image001.png image002.png image003.png image004.png image005.png SDG&E Response.pdf image006.png

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Kelly Bray
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For local information and daily updates on COVID-19, please visit **www.coronavirus-sd.com.** To receive updates via text, send **COSD COVID19** to **468-311.**

Coronavirus Disease 2019
COVID-19

From: Gabaldon, Joseph M <JGabaldon@sdge.com>
Sent: Friday, February 5, 2021 10:43 AM
To: Bray, Kelly <Kelly.Bray@sdcounty.ca.gov>
Cc: Cave, Duane <DCave@sdge.com>
Subject: County's NOP and Supplemental EIR

Good morning Kelly,

In response to the County's NOP, our SDG&E team has developed a series of suggested GHG reduction strategies for the CAP. The attached letter includes the latest strategies and initiatives on the topic.

As always, we would be happy to set up a virtual meeting to discuss our recommendations and support your efforts. Please let me know if our have any questions.

Joe

Joe Gabaldon
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February 4, 2021

Ms. Kelly Bray
CAP Project Manager
County of San Diego
5510 Overland Avenue, Ste. 310
San Diego, CA 92123

RE: Response to Notice of Preparation – Supplemental EIR (SEIR)

Dear Ms. Bray,

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to provide feedback on the County of San Diego's Notice of Preparation – Supplemental EIR. County staff's SEIR presentation last Thursday was enlightening. SDG&E is committed to supporting the County in this process.

In 2020, SDG&E delivered around 45% renewable energy, which is among the highest in the nation. SDG&E is a recognized leader in innovation and excellence, as evidenced by winning the ReliabilityOne® Award for 'Outstanding Reliability Performance' among utilities in the West. This honor was the 15th consecutive time that SDG&E received this highly coveted award.

To reduce Green House Gas (GHG) emissions, SDG&E would suggest the following strategies and tactics be included in your SEIR and Climate Action Plan:

Set specific goals and requirements
With current regulations and executive orders, goals should look to 2045 and include air quality (i.e. NOx, PM, etc.) as well as GHG emissions. Goals should include specific targets, metrics, and dates.

- Develop an overall county-wide plan/blueprint for Zero Emission Vehicle (ZEV) stations and vehicles
    - Set EV adoption goals for light-duty, medium-duty, and heavy-duty vehicles
        - Consider specific goals for beachhead/key segments (i.e. school buses and transit)
    - Set EV ZEV station goals:
        - Light-duty vehicles (level 2 and Direct Current Fast Chargers (DCFC) for public, workplace, and multi-unit dwellings)
        - Set specific goals for ZEV governmental and public stations at county facilities
        - Medium- and heavy-duty vehicles
- Set Vehicle Miles Travelled (VMT) reduction goals for the region and county fleets
    - Identify and facility Mobility Hubs support, i.e., EV shared vehicles, etc.

- County vehicles and projects
    - Accelerate the County fleet ZEV replacement/purchasing plan
    - Require a % of construction vehicles to be ZEV; when not ZEV require CARB-approved low carbon fuel
        - Underpin with GHG and air quality reduction targets
- Set ZEV requirements for building segments and new developments
    - ZEV parking preferences
    - ZEV stations installations and/or ZEV station readiness (i.e. panel upgrades, conduit runs, etc.)
- As the County increases its focus on renewable energy generation, streamlined permitting for solar farms, microgrids, battery storage and fuel cell facilities will be important.

Develop incentives and plans

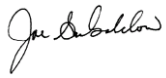
- Commit county funds:
    - Transitioning county fleets and installing ZEV stations at county facilities
    - Develop incentive programs to stimulate ZEV adoption and ZEV station goals i.e., Continue to permit fees for residential and commercial EV charging stations and inspections
    - Develop a residential energy efficiency program that includes window replacement, ceiling insulation, etc. Rollout should prioritize environmental justice communities.
    - Business energy efficiency programs should be initiated and enhanced
    - Our SDGE.com/LG website helps local governments with Energy Efficiency and other energy programs.
    - Increase tree canopy cover through rebates and support Arbor Day. SDG&E will support the effort with Right Tree Right Place (RTRP) information, which helps residents determine where the tree will grow. Attached is a link to our brochure: https://www.sdge.com/safety/tree-planting-guide
- Pursue grant federal and state grant opportunities to bring additional funds to the region

Marketing, Education, & Outreach and Supporting Partnerships

- Develop a marketing, education, & outreach strategy and materials for key stakeholders
    - EV charging station maps, education about existing programs, benefits about ZEVs, etc.
- Facilitate public-private partnerships where possible to support goals
- Develop an EV ambassador program promoting the benefits of EV ownership to County employees. SDG&E has a successful program and would be happy to share best practices.

We value our relationship with the County's CAP team and we would be happy to discuss these suggestions in greater detail. If you have any questions or require additional information, please let me know.

Sincerely,



Joe Gabaldon

From: Lori Thiel
To: CAP
Cc: Donna Bartlett-May
Subject: LWVSD CAP Advocacy
Date: Friday, February 5, 2021 6:32:51 PM

February 3, 2021

County of San Diego Planning & Development Services
Attn: Kelly Bray, CAP Project Manager
5510 Overland Ave, Suite 310
San Diego, CA 92123

Thank you for the invitation to comment on scoping for the County of San Diego'snew Climate Action Plan (CAP) Update, and your excellent presentation for the public on January 28th.

The League of Women Voters is a 100-year-old national organization that promotes informed participation of citizens in government, and advocates for policy positions that have been adopted by our membership. Our positions include support for action to mitigate and adapt for climate change. In San Diego County, there are two local leagues: the San Diego League and the North County San Diego League.

The League of Women Voters in San Diego County supports the board's directive to update the CAP with bold action to fight climate change. While there were many positive ideas in the 2018 CAP, we shared the disappointment of many that the 2018 version depended on carbon offset credits and did not show consistency with the SANDAG Regional Plan. Following are concerns we wish to raise at this time.

Carbon Offsets. We applaud the board's commitment to not use out-of-county carbon offset programs to meet mandated greenhouse-gas reductions. As the climate crisis has intensified even in the years since the 2018 CAP, we have come to see the urgency of preparing for various consequences of climate change, and ask that the new CAP give more attention to offset strategies that help our region adapt and build resilience.

Transportation and Land Use. The new CAP should relate to and coordinate with the County's General Plan in recognizing the importance of encouraging compact growth in order to reduce Vehicle Miles Traveled (VMT) and in supporting alternate modes of transportation. Reducing VMT is vital to reducing greenhouse-gas emissions. To that end we also urge consistency with and support for SANDAG's regional policies, especially the "5 Big Moves" as they relate to VMT.

Carbon Sequestration. We encourage the county to implement regenerative soil practices that result in carbon sequestration on county-held land in line with the California Healthy Soils Initiative and the Natural and Working Lands Climate Goal. Additionally, we encourage supporting climate-friendly agriculture throughout San Diego County as an essential tool for carbon sequestration.

Building Electrification. We support requiring that new residential developments be all-

electric, and that all-electric is the default for all new construction. We support programs to subsidize older homes' transition from gas to electric appliances, along with onsite solar power generation and electricity storage. Eliminating natural gas has co-benefits in protecting public health and safety. Distributed generation and storage can provide safety during power outages caused by storms or as precaution during wildfire conditions.

Regional Coordination. League positions urge regional agencies to coordinate intergovernmental policies and services such as transit and water supply. We encourage the County's close cooperation with the San Diego County Water Authority to support conservation efforts at all levels, and study use of local water resources. We commend the Board of Supervisors' commitment to a goal of zero carbon emissions in the region by 2035 by way of a Regional Sustainability Plan. We hope that one result of this effort would be more in-region offset opportunities.

Both LWVSD and LWVNCSD look forward to following the county's work on the CAP Update. We thank you for your work on this important policy that will deeply affect the future of our region.

--
Lori Thiel | President
she | her | hers
(949) 842-7931



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From:	Matouka, Neil@ARB
To:	CAP; Bray, Kelly
Cc:	Schilla, Annalisa@ARB; Hatcher, Shannon@ARB; Charlie Richmond; Poonam Boparai; Andrew Martin
Subject:	CARB Comment Letter on County of San Diego CAP Update
Date:	Tuesday, February 16, 2021 4:37:36 PM
Attachments:	image001.png CARB_SD_CAP_Comment_Letter_21_02_16.pdf

Dear Ms. Bray,

Thank you for providing the California Air Resources Board (CARB) with the opportunity to comment on the County of San Diego Climate Action Plan (CAP) Update. Please see the attached comment letter from Dr. Jennifer Gress, Chief of CARB's Sustainable Communities and Transportation Division.

Please let me know if you have any questions.

Thank you,
Neil Matouka

Neil Matouka
Air Pollution Specialist
Emerging Strategies Section
Sustainable Transportation and Communities Division
916.440.8206

CALIFORNIA
AIR RESOURCES BOARD

Gavin Newsom, Governor
Jared Blumenfeld, CalEPA Secretary
Liane M. Randolph, Chair

February 16, 2021

County of San Diego
Planning & Development Services
Attention: Kelly Bray
CAP Project Manager
5510 Overland Avenue, Suite 310
San Diego, California 92123
CAP@sdcounty.ca.gov

Dear Ms. Bray:

On behalf of California Air Resources Board (CARB) staff, I am writing to support the new San Diego County climate action plan (CAP) development process. I am encouraged by the Board of Supervisors' new direction to County staff to update the County's CAP, and look forward to additional engagement with the County during the CAP development process. Helping San Diego meet its climate targets in the near term is essential to supporting California's ability to meet our State targets. Further, developing this document, while prioritizing community input and environmental justice and equity, is key to ensuring local concerns and interests are addressed, and unintended impacts avoided or mitigated.

At the January 28, 2021, CAP Update Supplemental Environmental Impact Report (EIR) Virtual Scoping Meeting, San Diego County staff presented the County Board of Supervisors' direction for the new CAP, which included:

- No purchase of carbon offsets to meet emission reduction targets
- Emphasizes environmental justice and equity
- Shaped by community input
- Exceeds Senate Bill 32 greenhouse gas emissions reductions
- Meets net zero carbon emissions by 2035-2045

We support the County's efforts to pursue these goals in updating the CAP and I look forward to collaborating with County staff throughout the process. I hope that local governments across the State can learn from San Diego County's experience developing a CAP that is shaped by community input and meets net zero carbon emissions. If you have any questions, please feel free to contact Neil Matouka at (916) 440-8206 or by email at *neil.matouka@arb.ca.gov*.

Sincerely,

/s/ *Jennifer Gress*

Dr. Jennifer Gress, Chief
Sustainable Transportation and Communities Division

cc: See next page

cc: Kate Gordon, Director
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Appendix B

In-Process General Plan Amendment Project VMT and GHG Emission Forecast

SDC8 Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year, Unmitigated

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

3. Construction Emissions Details

3.1. Site Preparation (2025) - Unmitigated

3.3. Grading (2025) - Unmitigated

3.5. Grading (2026) - Unmitigated

3.7. Building Construction (2026) - Unmitigated

3.9. Building Construction (2027) - Unmitigated

3.11. Building Construction (2028) - Unmitigated

3.13. Building Construction (2029) - Unmitigated

3.15. Building Construction (2030) - Unmitigated

3.17. Building Construction (2031) - Unmitigated

3.19. Building Construction (2032) - Unmitigated

3.21. Building Construction (2033) - Unmitigated

3.23. Paving (2033) - Unmitigated

3.25. Paving (2034) - Unmitigated

3.27. Architectural Coating (2034) - Unmitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	SDC8
Construction Start Date	1/1/2025
Operational Year	2035
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.60
Precipitation (days)	36.4
Location	32.877137138603686, -116.70264008732502
County	San Diego
City	Unincorporated
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6103
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.20

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Single Family Housing	2,743	Dwelling Unit	891	5,348,850	32,128,367	—	7,653	—
Condo/Townhouse	117	Dwelling Unit	7.31	124,020	0.00	—	326	—
Mobile Home Park	104	Dwelling Unit	13.1	135,200	0.00	—	290	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	CO2e
Daily, Summer (Max)	—
Unmit.	21,370
Daily, Winter (Max)	—
Unmit.	20,735
Average Daily (Max)	—
Unmit.	14,630
Annual (Max)	—
Unmit.	2,422

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	CO2e
Daily - Summer (Max)	—
2025	6,814
2026	21,370

2027	21,002
2028	20,612
2029	20,201
2030	19,797
2031	19,351
2032	18,863
2033	18,525
2034	2,020
Daily - Winter (Max)	—
2025	6,803
2026	20,735
2027	20,384
2028	20,002
2029	19,607
2030	19,219
2031	18,789
2032	18,401
2033	17,982
2034	1,913
Average Daily	—
2025	4,567
2026	14,065
2027	14,630
2028	14,399
2029	14,075
2030	13,796
2031	13,484

2032	13,243
2033	11,620
2034	1,283
Annual	—
2025	756
2026	2,329
2027	2,422
2028	2,384
2029	2,330
2030	2,284
2031	2,232
2032	2,193
2033	1,924
2034	212

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	CO2e
Daily, Summer (Max)	—
Unmit.	205,825
Daily, Winter (Max)	—
Unmit.	202,885
Average Daily (Max)	—
Unmit.	110,231
Annual (Max)	—
Unmit.	18,250

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	CO2e
Daily, Summer (Max)	—
Mobile	53,275
Area	120,751
Energy	27,091
Water	940
Waste	3,729
Refrig.	40.2
Total	205,825
Daily, Winter (Max)	—
Mobile	50,786
Area	120,300
Energy	27,091
Water	940
Waste	3,729
Refrig.	40.2
Total	202,885
Average Daily	—
Mobile	51,183
Area	27,249
Energy	27,091
Water	940
Waste	3,729
Refrig.	40.2
Total	110,231

Annual	—
Mobile	8,474
Area	4,511
Energy	4,485
Water	156
Waste	617
Refrig.	6.65
Total	18,250

3. Construction Emissions Details

3.1. Site Preparation (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	5,314
Dust From Material Movement	—
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	5,314
Dust From Material Movement	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,150
Dust From Material Movement	—
Onsite truck	0.00

Annual	—
Off-Road Equipment	190
Dust From Material Movement	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	169
Vendor	0.00
Hauling	0.00
Daily, Winter (Max)	—
Worker	159
Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	34.7
Vendor	0.00
Hauling	0.00
Annual	—
Worker	5.75
Vendor	0.00
Hauling	0.00

3.3. Grading (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—

Off-Road Equipment	6,622
Dust From Material Movement	—
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	6,622
Dust From Material Movement	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	3,291
Dust From Material Movement	—
Onsite truck	0.00
Annual	—
Off-Road Equipment	545
Dust From Material Movement	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	193
Vendor	0.00
Hauling	0.00
Daily, Winter (Max)	—
Worker	182
Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	91.2
Vendor	0.00

Hauling	0.00
Annual	—
Worker	15.1
Vendor	0.00
Hauling	0.00

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Daily, Winter (Max)	—
Off-Road Equipment	6,621
Dust From Material Movement	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	389
Dust From Material Movement	—
Onsite truck	0.00
Annual	—
Off-Road Equipment	64.4
Dust From Material Movement	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Daily, Winter (Max)	—
Worker	178

Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	10.6
Vendor	0.00
Hauling	0.00
Annual	—
Worker	1.75
Vendor	0.00
Hauling	0.00

3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,577
Onsite truck	0.00
Annual	—
Off-Road Equipment	261
Onsite truck	0.00

Offsite	—
Daily, Summer (Max)	—
Worker	10,820
Vendor	8,144
Hauling	0.00
Daily, Winter (Max)	—
Worker	10,199
Vendor	8,130
Hauling	0.00
Average Daily	—
Worker	6,755
Vendor	5,333
Hauling	0.00
Annual	—
Worker	1,118
Vendor	883
Hauling	0.00

3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405

Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,718
Onsite truck	0.00
Annual	—
Off-Road Equipment	284
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	10,636
Vendor	7,961
Hauling	0.00
Daily, Winter (Max)	—
Worker	10,030
Vendor	7,949
Hauling	0.00
Average Daily	—
Worker	7,231
Vendor	5,681
Hauling	0.00
Annual	—
Worker	1,197
Vendor	941
Hauling	0.00

3.11. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,406
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,406
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,723
Onsite truck	0.00
Annual	—
Off-Road Equipment	285
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	10,439
Vendor	7,767
Hauling	0.00
Daily, Winter (Max)	—
Worker	9,838
Vendor	7,758
Hauling	0.00
Average Daily	—
Worker	7,118
Vendor	5,559
Hauling	0.00

Annual	—
Worker	1,178
Vendor	920
Hauling	0.00

3.13. Building Construction (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,718
Onsite truck	0.00
Annual	—
Off-Road Equipment	284
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	10,258
Vendor	7,537
Hauling	0.00
Daily, Winter (Max)	—

Worker	9,672
Vendor	7,530
Hauling	0.00
Average Daily	—
Worker	6,977
Vendor	5,380
Hauling	0.00
Annual	—
Worker	1,155
Vendor	891
Hauling	0.00

3.15. Building Construction (2030) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,718
Onsite truck	0.00
Annual	—
Off-Road Equipment	284

Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	10,087
Vendor	7,304
Hauling	0.00
Daily, Winter (Max)	—
Worker	9,513
Vendor	7,301
Hauling	0.00
Average Daily	—
Worker	6,862
Vendor	5,216
Hauling	0.00
Annual	—
Worker	1,136
Vendor	864
Hauling	0.00

3.17. Building Construction (2031) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—

Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,718
Onsite truck	0.00
Annual	—
Off-Road Equipment	284
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	9,898
Vendor	7,048
Hauling	0.00
Daily, Winter (Max)	—
Worker	9,337
Vendor	7,046
Hauling	0.00
Average Daily	—
Worker	6,734
Vendor	5,032
Hauling	0.00
Annual	—
Worker	1,115
Vendor	833
Hauling	0.00

3.19. Building Construction (2032) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,723
Onsite truck	0.00
Annual	—
Off-Road Equipment	285
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	9,662
Vendor	6,797
Hauling	0.00
Daily, Winter (Max)	—
Worker	9,201
Vendor	6,795
Hauling	0.00
Average Daily	—
Worker	6,654
Vendor	4,867
Hauling	0.00

Annual	—
Worker	1,102
Vendor	806
Hauling	0.00

3.21. Building Construction (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,530
Onsite truck	0.00
Annual	—
Off-Road Equipment	253
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	9,552
Vendor	6,568
Hauling	0.00
Daily, Winter (Max)	—

Worker	9,010
Vendor	6,567
Hauling	0.00
Average Daily	—
Worker	5,786
Vendor	4,176
Hauling	0.00
Annual	—
Worker	958
Vendor	691
Hauling	0.00

3.23. Paving (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Daily, Winter (Max)	—
Off-Road Equipment	1,516
Paving	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	119
Paving	—
Onsite truck	0.00
Annual	—
Off-Road Equipment	19.6

Paving	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Daily, Winter (Max)	—
Worker	118
Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	9.32
Vendor	0.00
Hauling	0.00
Annual	—
Worker	1.54
Vendor	0.00
Hauling	0.00

3.25. Paving (2034) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	1,516
Paving	—
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	1,516

Paving	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	484
Paving	—
Onsite truck	0.00
Annual	—
Off-Road Equipment	80.1
Paving	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	123
Vendor	0.00
Hauling	0.00
Daily, Winter (Max)	—
Worker	116
Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	37.5
Vendor	0.00
Hauling	0.00
Annual	—
Worker	6.21
Vendor	0.00
Hauling	0.00

3.27. Architectural Coating (2034) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	134
Architectural Coatings	—
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	134
Architectural Coatings	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	52.9
Architectural Coatings	—
Onsite truck	0.00
Annual	—
Off-Road Equipment	8.75
Architectural Coatings	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	1,886
Vendor	0.00
Hauling	0.00
Daily, Winter (Max)	—
Worker	1,779

Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	709
Vendor	0.00
Hauling	0.00
Annual	—
Worker	117
Vendor	0.00
Hauling	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Single Family Housing	369
Condo/Townhouse	10.6
Mobile Home Park	10.7
Total	390
Daily, Winter (Max)	—

Single Family Housing	369
Condo/Townhouse	10.6
Mobile Home Park	10.7
Total	390
Annual	—
Single Family Housing	61.0
Condo/Townhouse	1.75
Mobile Home Park	1.77
Total	64.6

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Single Family Housing	25,139
Condo/Townhouse	773
Mobile Home Park	789
Total	26,701
Daily, Winter (Max)	—
Single Family Housing	25,139
Condo/Townhouse	773
Mobile Home Park	789
Total	26,701
Annual	—
Single Family Housing	4,162
Condo/Townhouse	128
Mobile Home Park	131

Total	4,421

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	CO2e
Daily, Summer (Max)	—
Hearths	120,300
Consumer Products	—
Architectural Coatings	—
Landscape Equipment	451
Total	120,751
Daily, Winter (Max)	—
Hearths	120,300
Consumer Products	—
Architectural Coatings	—
Total	120,300
Annual	—
Hearths	4,474
Consumer Products	—
Architectural Coatings	—
Landscape Equipment	36.8
Total	4,511

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Single Family Housing	875
Condo/Townhouse	34.4
Mobile Home Park	30.6
Total	940
Daily, Winter (Max)	—
Single Family Housing	875
Condo/Townhouse	34.4
Mobile Home Park	30.6
Total	940
Annual	—
Single Family Housing	145
Condo/Townhouse	5.70
Mobile Home Park	5.06
Total	156

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Single Family Housing	3,421
Condo/Townhouse	163

Mobile Home Park	145
Total	3,729
Daily, Winter (Max)	—
Single Family Housing	3,421
Condo/Townhouse	163
Mobile Home Park	145
Total	3,729
Annual	—
Single Family Housing	566
Condo/Townhouse	27.0
Mobile Home Park	24.0
Total	617

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Single Family Housing	38.3
Condo/Townhouse	0.89
Mobile Home Park	0.97
Total	40.2
Daily, Winter (Max)	—
Single Family Housing	38.3
Condo/Townhouse	0.89
Mobile Home Park	0.97

Total	40.2
Annual	—
Single Family Housing	6.34
Condo/Townhouse	0.15
Mobile Home Park	0.16
Total	6.65

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	CO2e
Daily, Summer (Max)	—
Total	—
Daily, Winter (Max)	—
Total	—
Annual	—
Total	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	CO2e
Daily, Summer (Max)	—
Total	—
Daily, Winter (Max)	—

Total	—
Annual	—
Total	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	CO2e
Daily, Summer (Max)	—
Total	—
Daily, Winter (Max)	—
Total	—
Annual	—
Total	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	CO2e
Daily, Summer (Max)	—
Total	—
Daily, Winter (Max)	—
Total	—
Annual	—
Total	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Total	—
Daily, Winter (Max)	—
Total	—
Annual	—
Total	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	CO2e
Daily, Summer (Max)	—
Avoided	—
Subtotal	—
Sequestered	—
Subtotal	—
Removed	—
Subtotal	—
—	—
Daily, Winter (Max)	—
Avoided	—
Subtotal	—
Sequestered	—
Subtotal	—
Removed	—

Subtotal	—
—	—
Annual	—
Avoided	—
Subtotal	—
Sequestered	—
Subtotal	—
Removed	—
Subtotal	—
—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	1/1/2025	4/21/2025	5.00	79.0	—
Grading	Grading	4/22/2025	1/30/2026	5.00	204	—
Building Construction	Building Construction	1/31/2026	11/21/2033	5.00	2,036	—
Paving	Paving	11/22/2033	6/12/2034	5.00	145	—
Architectural Coating	Architectural Coating	6/13/2034	12/29/2034	5.00	144	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40

Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	12.0	LDA,LDT1,LDT2
Site Preparation	Vendor	—	7.63	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT

Grading	—	—	—	—
Grading	Worker	20.0	12.0	LDA,LDT1,LDT2
Grading	Vendor	—	7.63	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	1,147	12.0	LDA,LDT1,LDT2
Building Construction	Vendor	317	7.63	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	12.0	LDA,LDT1,LDT2
Paving	Vendor	—	7.63	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	229	12.0	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	7.63	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	11,356,342	3,785,447	0.00	0.00	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	119	0.00	—
Grading	—	—	612	0.00	—
Paving	0.00	0.00	0.00	0.00	30.2

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Single Family Housing	30.2	0%
Condo/Townhouse	—	0%
Mobile Home Park	—	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	589	0.03	< 0.005
2026	0.00	589	0.03	< 0.005
2027	0.00	589	0.03	< 0.005

2028	0.00	589	0.03	< 0.005
2029	0.00	589	0.03	< 0.005
2030	0.00	589	0.03	< 0.005
2031	0.00	589	0.03	< 0.005
2032	0.00	589	0.03	< 0.005
2033	0.00	589	0.03	< 0.005
2034	0.00	589	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	0.00	0.00	0.00	0.00	76,487	76,487	76,487	27,917,885

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	960
Gas Fireplaces	1509
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	274
Conventional Wood Stoves	0
Catalytic Wood Stoves	137

Non-Catalytic Wood Stoves	137
Pellet Wood Stoves	0
Condo/Townhouse	—
Wood Fireplaces	41
Gas Fireplaces	64
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	12
Conventional Wood Stoves	0
Catalytic Wood Stoves	6
Non-Catalytic Wood Stoves	6
Pellet Wood Stoves	0
Mobile Home Park	—
Wood Fireplaces	36
Gas Fireplaces	57
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	10
Conventional Wood Stoves	0
Catalytic Wood Stoves	5
Non-Catalytic Wood Stoves	5
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
11356341.75	3,785,447	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	16,845,524	7.99	0.0000	0.0000	78,221,948
Condo/Townhouse	483,135	7.99	0.0000	0.0000	2,406,074
Mobile Home Park	488,882	7.99	0.0000	0.0000	2,454,929

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	96,370,025	586,827,480
Condo/Townhouse	4,110,570	0.00
Mobile Home Park	3,653,840	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	1,814	—

Condo/Townhouse	86.4	—
Mobile Home Park	76.9	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Condo/Townhouse	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Mobile Home Park	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Mobile Home Park	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	23.3	annual days of extreme heat
Extreme Precipitation	6.25	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	30.9	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A

Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—

AQ-Ozone	78.2
AQ-PM	4.79
AQ-DPM	0.47
Drinking Water	62.6
Lead Risk Housing	48.8
Pesticides	0.00
Toxic Releases	10.9
Traffic	1.46
Effect Indicators	—
CleanUp Sites	71.6
Groundwater	22.1
Haz Waste Facilities/Generators	0.00
Impaired Water Bodies	12.5
Solid Waste	70.4
Sensitive Population	—
Asthma	17.9
Cardio-vascular	11.4
Low Birth Weights	67.2
Socioeconomic Factor Indicators	—
Education	36.9
Housing	0.08
Linguistic	0.00
Poverty	18.2
Unemployment	60.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	63.31322982
Employed	14.53868857
Median HI	78.01873476
Education	—
Bachelor's or higher	52.99627871
High school enrollment	100
Preschool enrollment	73.96381368
Transportation	—
Auto Access	98.98626973
Active commuting	8.943924034
Social	—
2-parent households	44.29616322
Voting	96.58668035
Neighborhood	—
Alcohol availability	78.86564866
Park access	59.74592583
Retail density	2.55357372
Supermarket access	2.399589375
Tree canopy	65.07121776
Housing	—
Homeownership	88.6179905
Housing habitability	96.50968818
Low-inc homeowner severe housing cost burden	92.04414218
Low-inc renter severe housing cost burden	99.08892596
Uncrowded housing	56.30694213

Health Outcomes	—
Insured adults	60.27203901
Arthritis	0.0
Asthma ER Admissions	42.2
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	34.5
Cognitively Disabled	21.0
Physically Disabled	42.3
Heart Attack ER Admissions	40.0
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	82.2
SLR Inundation Area	0.0

Children	47.4
Elderly	36.8
English Speaking	98.1
Foreign-born	2.7
Outdoor Workers	68.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	95.6
Traffic Density	0.7
Traffic Access	23.0
Other Indices	—
Hardship	35.2
Other Decision Support	—
2016 Voting	96.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	13.0
Healthy Places Index Score for Project Location (b)	64.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Utility Information	Only CO2e intensity factor is available from the project, hence CH4 and N2O EF are zeroed out.
Construction: Construction Phases	No demolition required

SDC8 Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

1.2. Land Use Types

1.3. User-Selected Emission Reduction Measures by Emissions Sector

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

2.2. Construction Emissions by Year, Unmitigated

2.4. Operations Emissions Compared Against Thresholds

2.5. Operations Emissions by Sector, Unmitigated

3. Construction Emissions Details

3.1. Site Preparation (2025) - Unmitigated

3.3. Grading (2025) - Unmitigated

3.5. Grading (2026) - Unmitigated

3.7. Building Construction (2026) - Unmitigated

3.9. Building Construction (2027) - Unmitigated

3.11. Building Construction (2028) - Unmitigated

3.13. Building Construction (2029) - Unmitigated

3.15. Building Construction (2030) - Unmitigated

3.17. Building Construction (2031) - Unmitigated

3.19. Building Construction (2032) - Unmitigated

3.21. Building Construction (2033) - Unmitigated

3.23. Paving (2033) - Unmitigated

3.25. Paving (2034) - Unmitigated

3.27. Architectural Coating (2034) - Unmitigated

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.1. Construction Schedule

5.2. Off-Road Equipment

5.2.1. Unmitigated

5.3. Construction Vehicles

5.3.1. Unmitigated

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

5.6.2. Construction Earthmoving Control Strategies

5.7. Construction Paving

5.8. Construction Electricity Consumption and Emissions Factors

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

6.2. Initial Climate Risk Scores

6.3. Adjusted Climate Risk Scores

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

7.2. Healthy Places Index Scores

7.3. Overall Health & Equity Scores

7.4. Health & Equity Measures

7.5. Evaluation Scorecard

7.6. Health & Equity Custom Measures

8. User Changes to Default Data

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	SDC8
Construction Start Date	1/1/2025
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.60
Precipitation (days)	36.4
Location	32.877137138603686, -116.70264008732502
County	San Diego
City	Unincorporated
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6103
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.20

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description

Single Family Housing	2,743	Dwelling Unit	891	5,348,850	32,128,367	—	7,653	—
Condo/Townhouse	117	Dwelling Unit	7.31	124,020	0.00	—	326	—
Mobile Home Park	104	Dwelling Unit	13.1	135,200	0.00	—	290	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	CO2e
Daily, Summer (Max)	—
Unmit.	21,370
Daily, Winter (Max)	—
Unmit.	20,735
Average Daily (Max)	—
Unmit.	14,630
Annual (Max)	—
Unmit.	2,422

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	CO2e
Daily - Summer (Max)	—
2025	6,814
2026	21,370

2027	21,002
2028	20,612
2029	20,201
2030	19,797
2031	19,351
2032	18,863
2033	18,525
2034	2,020
Daily - Winter (Max)	—
2025	6,803
2026	20,735
2027	20,384
2028	20,002
2029	19,607
2030	19,219
2031	18,789
2032	18,401
2033	17,982
2034	1,913
Average Daily	—
2025	4,567
2026	14,065
2027	14,630
2028	14,399
2029	14,075
2030	13,796
2031	13,484

2032	13,243
2033	11,620
2034	1,283
Annual	—
2025	756
2026	2,329
2027	2,422
2028	2,384
2029	2,330
2030	2,284
2031	2,232
2032	2,193
2033	1,924
2034	212

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	CO2e
Daily, Summer (Max)	—
Unmit.	199,430
Daily, Winter (Max)	—
Unmit.	196,749
Average Daily (Max)	—
Unmit.	104,042
Annual (Max)	—
Unmit.	17,225

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	CO2e
Daily, Summer (Max)	—
Mobile	46,880
Area	120,751
Energy	27,091
Water	940
Waste	3,729
Refrig.	40.2
Total	199,430
Daily, Winter (Max)	—
Mobile	44,651
Area	120,300
Energy	27,091
Water	940
Waste	3,729
Refrig.	40.2
Total	196,749
Average Daily	—
Mobile	44,994
Area	27,249
Energy	27,091
Water	940
Waste	3,729
Refrig.	40.2
Total	104,042

Annual	—
Mobile	7,449
Area	4,511
Energy	4,485
Water	156
Waste	617
Refrig.	6.65
Total	17,225

3. Construction Emissions Details

3.1. Site Preparation (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	5,314
Dust From Material Movement	—
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	5,314
Dust From Material Movement	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,150
Dust From Material Movement	—
Onsite truck	0.00

Annual	—
Off-Road Equipment	190
Dust From Material Movement	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	169
Vendor	0.00
Hauling	0.00
Daily, Winter (Max)	—
Worker	159
Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	34.7
Vendor	0.00
Hauling	0.00
Annual	—
Worker	5.75
Vendor	0.00
Hauling	0.00

3.3. Grading (2025) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—

Off-Road Equipment	6,622
Dust From Material Movement	—
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	6,622
Dust From Material Movement	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	3,291
Dust From Material Movement	—
Onsite truck	0.00
Annual	—
Off-Road Equipment	545
Dust From Material Movement	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	193
Vendor	0.00
Hauling	0.00
Daily, Winter (Max)	—
Worker	182
Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	91.2
Vendor	0.00

Hauling	0.00
Annual	—
Worker	15.1
Vendor	0.00
Hauling	0.00

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Daily, Winter (Max)	—
Off-Road Equipment	6,621
Dust From Material Movement	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	389
Dust From Material Movement	—
Onsite truck	0.00
Annual	—
Off-Road Equipment	64.4
Dust From Material Movement	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Daily, Winter (Max)	—
Worker	178

Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	10.6
Vendor	0.00
Hauling	0.00
Annual	—
Worker	1.75
Vendor	0.00
Hauling	0.00

3.7. Building Construction (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,577
Onsite truck	0.00
Annual	—
Off-Road Equipment	261
Onsite truck	0.00

Offsite	—
Daily, Summer (Max)	—
Worker	10,820
Vendor	8,144
Hauling	0.00
Daily, Winter (Max)	—
Worker	10,199
Vendor	8,130
Hauling	0.00
Average Daily	—
Worker	6,755
Vendor	5,333
Hauling	0.00
Annual	—
Worker	1,118
Vendor	883
Hauling	0.00

3.9. Building Construction (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405

Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,718
Onsite truck	0.00
Annual	—
Off-Road Equipment	284
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	10,636
Vendor	7,961
Hauling	0.00
Daily, Winter (Max)	—
Worker	10,030
Vendor	7,949
Hauling	0.00
Average Daily	—
Worker	7,231
Vendor	5,681
Hauling	0.00
Annual	—
Worker	1,197
Vendor	941
Hauling	0.00

3.11. Building Construction (2028) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,406
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,406
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,723
Onsite truck	0.00
Annual	—
Off-Road Equipment	285
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	10,439
Vendor	7,767
Hauling	0.00
Daily, Winter (Max)	—
Worker	9,838
Vendor	7,758
Hauling	0.00
Average Daily	—
Worker	7,118
Vendor	5,559
Hauling	0.00

Annual	—
Worker	1,178
Vendor	920
Hauling	0.00

3.13. Building Construction (2029) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,718
Onsite truck	0.00
Annual	—
Off-Road Equipment	284
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	10,258
Vendor	7,537
Hauling	0.00
Daily, Winter (Max)	—

Worker	9,672
Vendor	7,530
Hauling	0.00
Average Daily	—
Worker	6,977
Vendor	5,380
Hauling	0.00
Annual	—
Worker	1,155
Vendor	891
Hauling	0.00

3.15. Building Construction (2030) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,718
Onsite truck	0.00
Annual	—
Off-Road Equipment	284

Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	10,087
Vendor	7,304
Hauling	0.00
Daily, Winter (Max)	—
Worker	9,513
Vendor	7,301
Hauling	0.00
Average Daily	—
Worker	6,862
Vendor	5,216
Hauling	0.00
Annual	—
Worker	1,136
Vendor	864
Hauling	0.00

3.17. Building Construction (2031) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—

Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,718
Onsite truck	0.00
Annual	—
Off-Road Equipment	284
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	9,898
Vendor	7,048
Hauling	0.00
Daily, Winter (Max)	—
Worker	9,337
Vendor	7,046
Hauling	0.00
Average Daily	—
Worker	6,734
Vendor	5,032
Hauling	0.00
Annual	—
Worker	1,115
Vendor	833
Hauling	0.00

3.19. Building Construction (2032) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,723
Onsite truck	0.00
Annual	—
Off-Road Equipment	285
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	9,662
Vendor	6,797
Hauling	0.00
Daily, Winter (Max)	—
Worker	9,201
Vendor	6,795
Hauling	0.00
Average Daily	—
Worker	6,654
Vendor	4,867
Hauling	0.00

Annual	—
Worker	1,102
Vendor	806
Hauling	0.00

3.21. Building Construction (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	2,405
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	1,530
Onsite truck	0.00
Annual	—
Off-Road Equipment	253
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	9,552
Vendor	6,568
Hauling	0.00
Daily, Winter (Max)	—

Worker	9,010
Vendor	6,567
Hauling	0.00
Average Daily	—
Worker	5,786
Vendor	4,176
Hauling	0.00
Annual	—
Worker	958
Vendor	691
Hauling	0.00

3.23. Paving (2033) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Daily, Winter (Max)	—
Off-Road Equipment	1,516
Paving	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	119
Paving	—
Onsite truck	0.00
Annual	—
Off-Road Equipment	19.6

Paving	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Daily, Winter (Max)	—
Worker	118
Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	9.32
Vendor	0.00
Hauling	0.00
Annual	—
Worker	1.54
Vendor	0.00
Hauling	0.00

3.25. Paving (2034) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	1,516
Paving	—
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	1,516

Paving	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	484
Paving	—
Onsite truck	0.00
Annual	—
Off-Road Equipment	80.1
Paving	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	123
Vendor	0.00
Hauling	0.00
Daily, Winter (Max)	—
Worker	116
Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	37.5
Vendor	0.00
Hauling	0.00
Annual	—
Worker	6.21
Vendor	0.00
Hauling	0.00

3.27. Architectural Coating (2034) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	CO2e
Onsite	—
Daily, Summer (Max)	—
Off-Road Equipment	134
Architectural Coatings	—
Onsite truck	0.00
Daily, Winter (Max)	—
Off-Road Equipment	134
Architectural Coatings	—
Onsite truck	0.00
Average Daily	—
Off-Road Equipment	52.9
Architectural Coatings	—
Onsite truck	0.00
Annual	—
Off-Road Equipment	8.75
Architectural Coatings	—
Onsite truck	0.00
Offsite	—
Daily, Summer (Max)	—
Worker	1,886
Vendor	0.00
Hauling	0.00
Daily, Winter (Max)	—
Worker	1,779

Vendor	0.00
Hauling	0.00
Average Daily	—
Worker	709
Vendor	0.00
Hauling	0.00
Annual	—
Worker	117
Vendor	0.00
Hauling	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Single Family Housing	369
Condo/Townhouse	10.6
Mobile Home Park	10.7
Total	390
Daily, Winter (Max)	—

Single Family Housing	369
Condo/Townhouse	10.6
Mobile Home Park	10.7
Total	390
Annual	—
Single Family Housing	61.0
Condo/Townhouse	1.75
Mobile Home Park	1.77
Total	64.6

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Single Family Housing	25,139
Condo/Townhouse	773
Mobile Home Park	789
Total	26,701
Daily, Winter (Max)	—
Single Family Housing	25,139
Condo/Townhouse	773
Mobile Home Park	789
Total	26,701
Annual	—
Single Family Housing	4,162
Condo/Townhouse	128
Mobile Home Park	131

Total	4,421

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	CO2e
Daily, Summer (Max)	—
Hearths	120,300
Consumer Products	—
Architectural Coatings	—
Landscape Equipment	451
Total	120,751
Daily, Winter (Max)	—
Hearths	120,300
Consumer Products	—
Architectural Coatings	—
Total	120,300
Annual	—
Hearths	4,474
Consumer Products	—
Architectural Coatings	—
Landscape Equipment	36.8
Total	4,511

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Single Family Housing	875
Condo/Townhouse	34.4
Mobile Home Park	30.6
Total	940
Daily, Winter (Max)	—
Single Family Housing	875
Condo/Townhouse	34.4
Mobile Home Park	30.6
Total	940
Annual	—
Single Family Housing	145
Condo/Townhouse	5.70
Mobile Home Park	5.06
Total	156

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Single Family Housing	3,421
Condo/Townhouse	163

Mobile Home Park	145
Total	3,729
Daily, Winter (Max)	—
Single Family Housing	3,421
Condo/Townhouse	163
Mobile Home Park	145
Total	3,729
Annual	—
Single Family Housing	566
Condo/Townhouse	27.0
Mobile Home Park	24.0
Total	617

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Single Family Housing	38.3
Condo/Townhouse	0.89
Mobile Home Park	0.97
Total	40.2
Daily, Winter (Max)	—
Single Family Housing	38.3
Condo/Townhouse	0.89
Mobile Home Park	0.97

Total	40.2
Annual	—
Single Family Housing	6.34
Condo/Townhouse	0.15
Mobile Home Park	0.16
Total	6.65

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	CO2e
Daily, Summer (Max)	—
Total	—
Daily, Winter (Max)	—
Total	—
Annual	—
Total	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	CO2e
Daily, Summer (Max)	—
Total	—
Daily, Winter (Max)	—

Total	—
Annual	—
Total	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	CO2e
Daily, Summer (Max)	—
Total	—
Daily, Winter (Max)	—
Total	—
Annual	—
Total	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	CO2e
Daily, Summer (Max)	—
Total	—
Daily, Winter (Max)	—
Total	—
Annual	—
Total	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	CO2e
Daily, Summer (Max)	—
Total	—
Daily, Winter (Max)	—
Total	—
Annual	—
Total	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	CO2e
Daily, Summer (Max)	—
Avoided	—
Subtotal	—
Sequestered	—
Subtotal	—
Removed	—
Subtotal	—
—	—
Daily, Winter (Max)	—
Avoided	—
Subtotal	—
Sequestered	—
Subtotal	—
Removed	—

Subtotal	—
—	—
Annual	—
Avoided	—
Subtotal	—
Sequestered	—
Subtotal	—
Removed	—
Subtotal	—
—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Site Preparation	Site Preparation	1/1/2025	4/21/2025	5.00	79.0	—
Grading	Grading	4/22/2025	1/30/2026	5.00	204	—
Building Construction	Building Construction	1/31/2026	11/21/2033	5.00	2,036	—
Paving	Paving	11/22/2033	6/12/2034	5.00	145	—
Architectural Coating	Architectural Coating	6/13/2034	12/29/2034	5.00	144	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Site Preparation	Rubber Tired Dozers	Diesel	Average	3.00	8.00	367	0.40

Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	4.00	8.00	84.0	0.37
Grading	Excavators	Diesel	Average	2.00	8.00	36.0	0.38
Grading	Graders	Diesel	Average	1.00	8.00	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	8.00	367	0.40
Grading	Scrapers	Diesel	Average	2.00	8.00	423	0.48
Grading	Tractors/Loaders/Backhoes	Diesel	Average	2.00	8.00	84.0	0.37
Building Construction	Cranes	Diesel	Average	1.00	7.00	367	0.29
Building Construction	Forklifts	Diesel	Average	3.00	8.00	82.0	0.20
Building Construction	Generator Sets	Diesel	Average	1.00	8.00	14.0	0.74
Building Construction	Tractors/Loaders/Backhoes	Diesel	Average	3.00	7.00	84.0	0.37
Building Construction	Welders	Diesel	Average	1.00	8.00	46.0	0.45
Paving	Pavers	Diesel	Average	2.00	8.00	81.0	0.42
Paving	Paving Equipment	Diesel	Average	2.00	8.00	89.0	0.36
Paving	Rollers	Diesel	Average	2.00	8.00	36.0	0.38
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.00	37.0	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Site Preparation	—	—	—	—
Site Preparation	Worker	17.5	12.0	LDA,LDT1,LDT2
Site Preparation	Vendor	—	7.63	HHDT,MHDT
Site Preparation	Hauling	0.00	20.0	HHDT
Site Preparation	Onsite truck	—	—	HHDT

Grading	—	—	—	—
Grading	Worker	20.0	12.0	LDA,LDT1,LDT2
Grading	Vendor	—	7.63	HHDT,MHDT
Grading	Hauling	0.00	20.0	HHDT
Grading	Onsite truck	—	—	HHDT
Building Construction	—	—	—	—
Building Construction	Worker	1,147	12.0	LDA,LDT1,LDT2
Building Construction	Vendor	317	7.63	HHDT,MHDT
Building Construction	Hauling	0.00	20.0	HHDT
Building Construction	Onsite truck	—	—	HHDT
Paving	—	—	—	—
Paving	Worker	15.0	12.0	LDA,LDT1,LDT2
Paving	Vendor	—	7.63	HHDT,MHDT
Paving	Hauling	0.00	20.0	HHDT
Paving	Onsite truck	—	—	HHDT
Architectural Coating	—	—	—	—
Architectural Coating	Worker	229	12.0	LDA,LDT1,LDT2
Architectural Coating	Vendor	—	7.63	HHDT,MHDT
Architectural Coating	Hauling	0.00	20.0	HHDT
Architectural Coating	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	11,356,342	3,785,447	0.00	0.00	—

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (cy)	Material Exported (cy)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Site Preparation	—	—	119	0.00	—
Grading	—	—	612	0.00	—
Paving	0.00	0.00	0.00	0.00	30.2

5.6.2. Construction Earthmoving Control Strategies

Non-applicable. No control strategies activated by user.

5.7. Construction Paving

Land Use	Area Paved (acres)	% Asphalt
Single Family Housing	30.2	0%
Condo/Townhouse	—	0%
Mobile Home Park	—	0%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2025	0.00	589	0.03	< 0.005
2026	0.00	589	0.03	< 0.005
2027	0.00	589	0.03	< 0.005

2028	0.00	589	0.03	< 0.005
2029	0.00	589	0.03	< 0.005
2030	0.00	589	0.03	< 0.005
2031	0.00	589	0.03	< 0.005
2032	0.00	589	0.03	< 0.005
2033	0.00	589	0.03	< 0.005
2034	0.00	589	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	0.00	0.00	0.00	0.00	73,979	73,979	73,979	27,002,499

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	960
Gas Fireplaces	1509
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	274
Conventional Wood Stoves	0
Catalytic Wood Stoves	137

Non-Catalytic Wood Stoves	137
Pellet Wood Stoves	0
Condo/Townhouse	—
Wood Fireplaces	41
Gas Fireplaces	64
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	12
Conventional Wood Stoves	0
Catalytic Wood Stoves	6
Non-Catalytic Wood Stoves	6
Pellet Wood Stoves	0
Mobile Home Park	—
Wood Fireplaces	36
Gas Fireplaces	57
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	10
Conventional Wood Stoves	0
Catalytic Wood Stoves	5
Non-Catalytic Wood Stoves	5
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
11356341.75	3,785,447	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	16,845,524	7.99	0.0000	0.0000	78,221,948
Condo/Townhouse	483,135	7.99	0.0000	0.0000	2,406,074
Mobile Home Park	488,882	7.99	0.0000	0.0000	2,454,929

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	96,370,025	586,827,480
Condo/Townhouse	4,110,570	0.00
Mobile Home Park	3,653,840	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	1,814	—

Condo/Townhouse	86.4	—
Mobile Home Park	76.9	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Condo/Townhouse	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Condo/Townhouse	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Mobile Home Park	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Mobile Home Park	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)

5.17. User Defined

Equipment Type	Fuel Type

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	23.3	annual days of extreme heat
Extreme Precipitation	6.25	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	30.9	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A

Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	N/A	N/A	N/A	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	N/A	N/A	N/A	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	N/A	N/A	N/A	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—

AQ-Ozone	78.2
AQ-PM	4.79
AQ-DPM	0.47
Drinking Water	62.6
Lead Risk Housing	48.8
Pesticides	0.00
Toxic Releases	10.9
Traffic	1.46
Effect Indicators	—
CleanUp Sites	71.6
Groundwater	22.1
Haz Waste Facilities/Generators	0.00
Impaired Water Bodies	12.5
Solid Waste	70.4
Sensitive Population	—
Asthma	17.9
Cardio-vascular	11.4
Low Birth Weights	67.2
Socioeconomic Factor Indicators	—
Education	36.9
Housing	0.08
Linguistic	0.00
Poverty	18.2
Unemployment	60.6

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	63.31322982
Employed	14.53868857
Median HI	78.01873476
Education	—
Bachelor's or higher	52.99627871
High school enrollment	100
Preschool enrollment	73.96381368
Transportation	—
Auto Access	98.98626973
Active commuting	8.943924034
Social	—
2-parent households	44.29616322
Voting	96.58668035
Neighborhood	—
Alcohol availability	78.86564866
Park access	59.74592583
Retail density	2.55357372
Supermarket access	2.399589375
Tree canopy	65.07121776
Housing	—
Homeownership	88.6179905
Housing habitability	96.50968818
Low-inc homeowner severe housing cost burden	92.04414218
Low-inc renter severe housing cost burden	99.08892596
Uncrowded housing	56.30694213

Health Outcomes	—
Insured adults	60.27203901
Arthritis	0.0
Asthma ER Admissions	42.2
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	34.5
Cognitively Disabled	21.0
Physically Disabled	42.3
Heart Attack ER Admissions	40.0
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	19.6
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	82.2
SLR Inundation Area	0.0

Children	47.4
Elderly	36.8
English Speaking	98.1
Foreign-born	2.7
Outdoor Workers	68.1
Climate Change Adaptive Capacity	—
Impervious Surface Cover	95.6
Traffic Density	0.7
Traffic Access	23.0
Other Indices	—
Hardship	35.2
Other Decision Support	—
2016 Voting	96.8

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	13.0
Healthy Places Index Score for Project Location (b)	64.0
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

Screen	Justification
Characteristics: Utility Information	Only CO2e intensity factor is available from the project, hence CH4 and N2O EF are zeroed out.
Construction: Construction Phases	No demolition required

FEHR PEERS

Memorandum

Date: October 2, 2023

To: Meghan Kelly, County of San Diego

From: Katy Cole and Andrew Scher, Fehr & Peers

Subject: County of San Diego In-Process General Plan Amendments VMT Assessment

SD21-0394

This memorandum provides of the results of the transportation/Vehicle Miles Traveled (VMT) modeling completed for the County of San Diego in process General Plan Amendments. This memorandum summarizes the study scenarios, land use changes, travel demand model procedures, and vehicles miles traveled (VMT) calculations.

The SANDAG ABM 2+ model using land use data set ("DS") 39 for 2035 and 2050 was used to determine the VMT estimates for the General Plan Amemndment scenario. This is consistent with the model version and procedures used for the Climate Action Plan (CAP) Supplemental Environmental Report (SEIR).

Scenarios

The following scenarios were modeled/analyzed:

- Project scenario – SANDAG Regional Plan EIR Alternative 2 land uses and transportation network.
- General Plan Amendment scenario – Project scenario cumulative land use totals and transportation network with the addition of new households associated with current General Plan Amendment projects.

Project Scenario

The SANDAG Regional Plan EIR Alternative 2 (Data Set 39) model version, land uses, and VMT results are used to represent the proposed Project for the CAP SEIR. The land use assumptions contained in Data Set 39 are consistent with historical growth patterns in the unincorporated County and reflect expected growth consistent with the General Plan for the county. Additionally, the transportation network and policy inputs consist of "transportation projects with

environmental clearance, that have full funding, are under construction, or are otherwise reasonably foreseeable based on current plans…" (SANDAG 2021 Regional Plan EIR, Chapter 6 Alternatives Analysis, Page 6-3).

Table 1 shows the housing totals and growth modeled within the county for the Project.

Table 1: DS 39 Unincorporated Land Use Totals by Model Year

Year	Total Households	Growth from Base Year
Base Year (2016)	180,543	-
2035	195,249	14,706
2050	199,250	18,707

Source: SANDAG, Fehr & Peers.

General Plan Amendment Scenario

This scenario adds households associated with current General Plan Amendment project to the Project scenario. The following changes were made to model land uses compared to the Project scenario:

- Residential growth for any given general plan amendment project was added to the MGRA(s) overlapping the project's estimated location/size.
- All growth was distributed proportionally based on land area of the MGRAs (uniformly increasing the density of the MGRAs) for projects overlapping more than one MGRA.
- Household characteristics (single family, multifamily, income, size, etc) were sampled based on household characteristics in similar MGRAs nearby.

This scenario assumes 2,964 additional households compared to the Project scenario. This includes 2,743 single family homes, 117 multi-family homes, and 104 mobile homes. These additional households were assumed for both 2035 and 2050.

Table 2 shows the list of General Plan Amendment projects considered and the households associated with each project.

Table 2: General Plan Amendment Project Land Use Totals

Year	Total Households
Ivanhoe Ranch	120
Warner Springs Ranch Resort	45
Peppertree Park	685
Passerrelle-Campus Park	138
Abdali Gas Station	-
Labrador Lane	104
Rancho Librado	56
Castle Creek	63
Preserve at Riverbend	1,300
Harmony Grove Village South	453
Total:	**2,964**

Source: SANDAG, Fehr & Peers.

Methodology for Determining Total VMT

Fehr & Peers utilized the model outputs for the model scenarios evaluate changes in VMT for the unincorporated County. Total VMT and transportation metrics were evaluated for 2035 and 2050 conditions using the "CAP" method[1] as follows:

- Total VMT produced using the "CAP" method includes all internal VMT, ½ of internal to external VMT, and ½ of external to internal VMT. For example, all VMT originating from trips that start and end in the unincorporated area are included. One half of the VMT that originates in the unincorporated County but ends in one of the region's cities is included AND one half of the VMT that originates in one of the cities but ends in the unincorporated area is included.

Total VMT Generated (CAP)	All vehicle-trips are traced to the zone or zones of study. This includes internal to internal (II), 1/2 internal to external (IX), and 1/2 external to internal (XI) trips. May use final assignment origin-destination (OD) trip tables or production (P) and attraction (A) estimates multiplied by distance skims. When the model has multiple assignment periods, OD trip tables and congested skims from each period should be used.	

[1] "The "CAP" method for estimating total VMT is used throughout California and is the ICLEI (ICLEI-Local Governments for Sustainability) recommended methodology. In addition, it is documented in the SANDAG Regional Climate Action Planning Framework (ReCAP), December 2020, Appendix I, Pages 18-21.

In addition, adjustments were made to account for military and tribal land, which is not within the County's jurisdiction. The *Military and Tribal VMT Adjustment for the San Diego County CAP Model Scenarios* (Fehr & Peers, February 2023) describes the process for the adjustment.

Results

Table 3 shows base year CAP VMT as well as 2035 CAP VMT for the Project and General Plan Amendments scenario[2]. **Table 4** shows 2016 CAP VMT as well as 2050 CAP VMT for the Project and the General Plan Amendments scenario.

Table 3: 2035 Total VMT

Alternative	Unincorporated County Total Weekday VMT[1]	Change from Project Alternative	Percent Change
Base Year (2016)	8,853,215	-	-
Project	9,635,081	0	0.0%
General Plan Amendments	9,715,536	80,455	0.84%

Notes: [1] CAP VMT = II VMT + 1/2*IE VMT + 1/2*EI VMT
Source: SANDAG, Fehr & Peers.

Table 4: 2050 Total VMT

Alternative	Unincorporated County Total Weekday VMT[1]	Change from Project Alternative	Percent Change
2016	8,853,215	-	-
Project	10,216,009	0	0.0%
General Plan Amendments	10,293,826	77,817	0.76%

Notes: [1] CAP VMT = II VMT + 1/2*IE VMT + 1/2*EI VMT
Source: SANDAG, Fehr & Peers.

The General Plan Amendments scenario results in a 0.84% increase in unincorporated County VMT for 2035 and a 0.76% increase in unincorporated County VMT for 2050. These changes appear very small; however, it is important to consider that in the base year (2016) the unincorporated County already generates approximately 8.8 million VMT. Only minor decreases in VMT associated with the existing population are expected due to the assumptions in the DS 39 version of the model. Therefore, Fehr & Peers expects the magnitude overall VMT reduction

[2] VMT results for the General Plan Amendments alternative were calibrated to be consistent with results published for the County's CAP GHG Inventory sourced from model results provided directly from SANDAG. Each model run performed produces varied results since travel demand modeling is a simulation; therefore, the calibration was made to allow for direct comparison to the County's CAP GHG Inventory.

between the Project and these two alternatives to be small since the vast majority of unincorporated County VMT under future year alternatives can be attributed to existing land uses.

Another way to understand the VMT outcomes of additional land use within the County is to evaluate the VMT associated with the land use growth. For example, assuming the VMT associated with existing residents is held constant at the 2016 base year levels, the change in VMT from 2016 base year levels for the Project and the General Plan Amendments scenario would represent the VMT associated with new development beyond base year. This is shown in **Table 6** and **Table 7** for 2035 and 2050 respectively.

Table 6: 2035 Change in VMT compared to Project Growth in VMT

Alternative	County Total VMT[1]	Change in VMT from Base Year	Percent of Project Growth in VMT	Change in VMT Growth
Base Year (2016)	8,853,215	-	-	-
Project	9,635,081	781,866	100.0%	0.0%
General Plan Amendments	9,715,536	862,321	110.3%	10.3%

Notes: [1] CAP VMT = II VMT + 1/2*IE VMT + 1/2*EI VMT
Source: SANDAG, Fehr & Peers.

Table 6: 2050 Change in VMT compared to Project Growth in VMT

Alternative	County Total VMT[1]	Change in VMT from Base Year	Percent of Project Growth in VMT	Change in VMT Growth
Base Year (2016)	8,853,215	-	-	-
Project	10,216,009	1,362,794	100.0%	0.0%
General Plan Amendments	10,293,826	1,440,611	105.7%	5.7%

Notes: [1] CAP VMT = II VMT + 1/2*IE VMT + 1/2*EI VMT
Source: SANDAG, Fehr & Peers.

Focusing on the growth in VMT since 2016, growth in VMT due to General Plan Amendment projects is 10.3% higher than the Project for 2035 and 5.7% higher for 2050. VMT is not reduced because the General Plan Amendments as modeled (including only additional households in the model) do not provide closer retail, schools, and other destinations for existing households, therefore having a limited effect on reducing commute distances and other trip distances for existing residents.

Note that no employment changes associated with the General Plan Amendment projects assumed in the modeling. Many of the General Plan Amendment projects have limited information on non-residential uses and the residential component is the major component of most of the projects. The modeling therefore reflects the highest VMT outcomes since it does not capture the typical benefits associated with mixed-use developments and neighborhood serving

retail and focuses only on growth in housing units. Denser development would likely catalyze growth in employment and mixed-use development and would result in greater VMT benefits than shown.

Additional reductions in VMT could also occur if transportation network changes were made compared to the Project model scenario to encourage transit and active transportation.

Appendix C

Smart Growth Alternative VMT Forecast

FEHR PEERS

Memorandum

Date: October 2, 2023

To: Meghan Kelly, County of San Diego

From: Katy Cole and Andrew Scher, Fehr & Peers

Subject: County of San Diego Climate Action Plan SEIR VMT Assessment

SD21-0394

This memorandum provides of the results of the transportation/Vehicle Miles Traveled (VMT) modeling completed for the County of San Diego Climate Action Plan (CAP) Supplemental Environmental Impact Report (SEIR). This memorandum summarizes the project study scenarios, land use changes, travel demand model procedures, and vehicles miles traveled (VMT) calculations.

The SANDAG ABM 2+ model using land use data set ("DS") 39 for 2035 and 2050 was used to determine the VMT estimates for the CAP SEIR. As a cross-reference, the "County of San Diego Climate Action Plan Inventory Transportation Modeling Overview" Memorandum (Fehr & Peers, October 2023) documents that the DS 39 land use data set is appropriate to use as the basis for CAP SEIR model scenarios. It also documents that the SANDAG ABM 2+ is the appropriate tool for analyzing existing and future VMT at a regional scale for the unincorporated county.

Alternatives

The following CAP alternatives scenarios were modeled/analyzed:

- Project scenario – SANDAG Regional Plan EIR Alternative 2 land uses and transportation network.
- 2021 Regional Plan Sustainable Communities Strategy (SCS) Alternative – SANDAG 2021 Regional Plan land uses and transportation network.
- Fire Safe and VMT Efficient Alternative – Project scenario cumulative land use totals and transportation network. Moves half of unincorporated County household growth to unincorporated VMT efficient areas that are considered fire safe.
- Village Support Areas Alternative – Project scenario cumulative land use totals and transportation network. Moves all unincorporated County household growth to

designated unincorporated villages or unincorporated areas within a half-mile of those villages.

Project Scenario

The SANDAG Regional Plan EIR Alternative 2 (Data Set 39) model version, land uses, and VMT results are used to represent the proposed Project for the CAP SEIR. The land use assumptions contained in Data Set 39 are consistent with historical growth patterns in the unincorporated County and reflect expected growth consistent with the General Plan for the county. Additionally, the transportation network and policy inputs consist of "transportation projects with environmental clearance, that have full funding, are under construction, or are otherwise reasonably foreseeable based on current plans…" (SANDAG 2021 Regional Plan EIR, Chapter 6 Alternatives Analysis, Page 6-3).

Table 1 shows the housing totals and growth modeled within the county for the Project.

Table 1: DS 39 Unincorporated Land Use Totals by Model Year

Year	Total Households	Growth from Base Year
Base Year (2016)	180,543	-
2035	195,249	14,706
2050	199,250	18,707

Source: SANDAG, Fehr & Peers.

2021 Regional Plan/SCS Alternative

The adopted SANDAG 2021 Regional Plan assumes 9,902 new households in the unincorporated County between the base year and 2050 (with almost all of the growth occurring between the base year and 2035). Additionally, the 2021 Regional Plan/SCS version of the model includes the Road User Charge as a funding source for the Regional Plan. The Road User Charge directly affects auto operating costs; including the Road User Charge results in lower VMT forecasts than scenarios without the Road User Charge. On September 23, 2022 the SANDAG Board directed SANDAG staff to prepare an amendment to the 2021 Regional Plan without the Road User Charge. The amendment is expected to be brought to the SANDAG Board of Directors for consideration on October 27, 2023. In addition, the SANDAG Board voted on September 22, 2023 against including the Road User Charge in the 2025 Regional Plan.

Table 2 shows the number of households in the county by model year for the SCS alternative.

Table 2: SCS Alternative Unincorporated Land Use Totals by Model Year

Year	Total Households	Growth from Base Year
2016	180,543	-
2035	188,988	8,445
2050	190,445	9,902

Source: SANDAG, Fehr & Peers.

Fire Safe and VMT Efficient Alternative

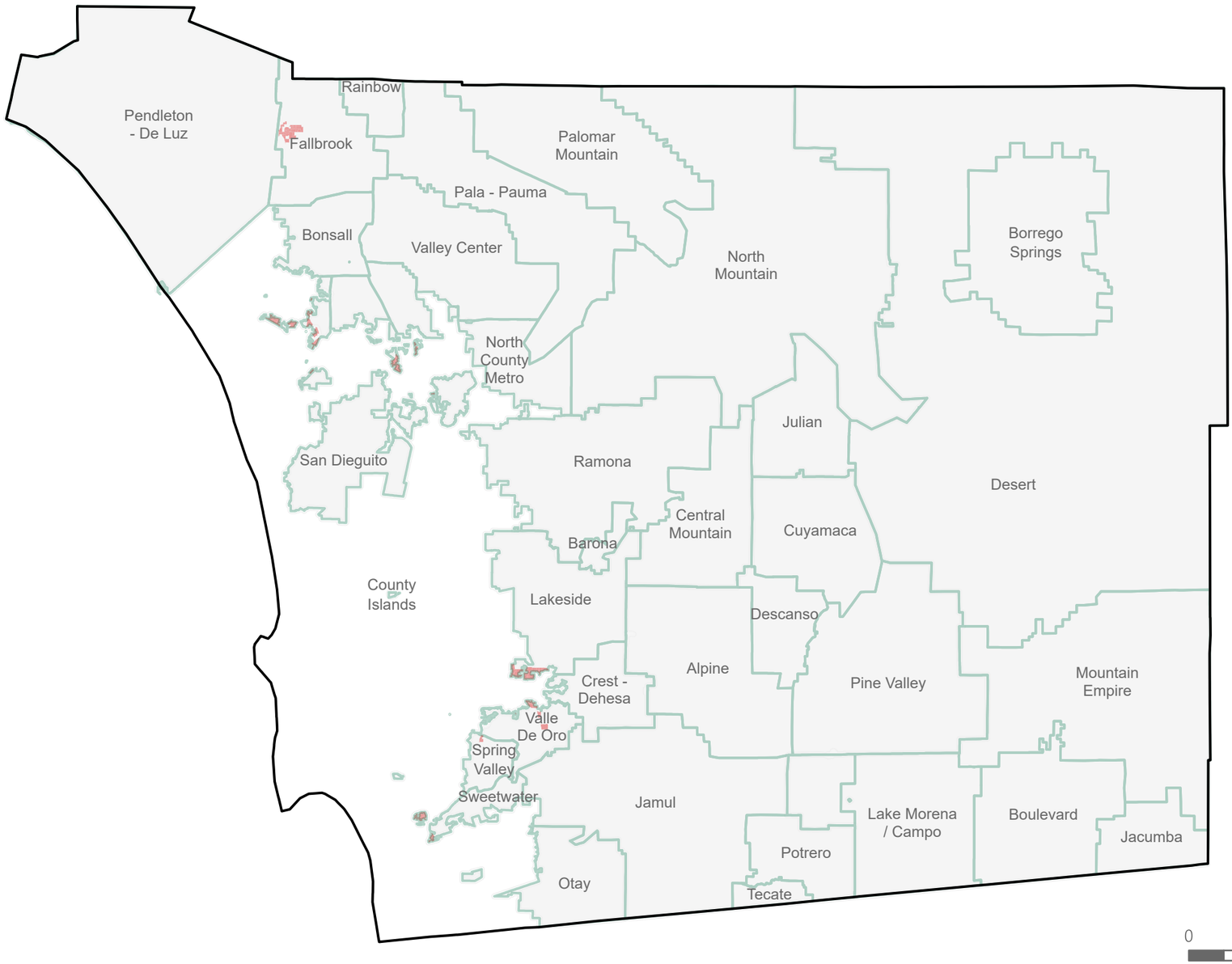
This alternative reassigns housing growth from the Project scenario to VMT efficient areas that are considered fire safe. Specifically, half the housing growth in units in the unincorporated County would occur in areas designated as fire safe and VMT efficient. These areas are shown on **Figure 1** and represent areas that are both not designated "high" or "very high" fire and that have a VMT per resident of 15% below the SANDAG regional average.

The following changes were made to model land uses compared to the Project alternative:

- Half of all unincorporated County growth outside fire safe and VMT efficient master geographic reference areas (MGRAs) was moved to those MGRAs (MGRAs within VMT efficient TAZs and outside high and very high fire hazard areas). The other half of unincorporated County growth was not moved.
- No growth was moved from unincorporated MGRAs that are over 90% tribal, military, federal, or state land (not under County control) with growth greater than 10 households.
- All growth moved to VMT efficient MGRAs was distributed proportionally based on land area of the MGRAs (uniformly increasing the density of the MGRAs).

Table 3 shows the number of households moved to fire safe and VMT efficient areas by Community Plan Area (CPA).

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Legend

- SANDAG Region
- Community Plan Area
- Fire Safe and VMT Efficient Areas

Figure 1: Fire Safe and VMT Efficient Areas

Table 3: Households moved from CPAs to VMT Efficient Areas that are Fire Safe

CPA	Number of Households Moved from a CPA to a VMT Efficient Area that is Fire Safe by Model Year	
	2035	2050
Spring Valley	387	534
Sweetwater	158	219
Otay	1,032	1,528
County Islands	0	0
Valle De Oro	151	224
Crest-Dehesa	13	14
Lakeside	493	602
Alpine	6	6
Barona	0	0
Ramona	160	161
Central Mountain	12	12
San Dieguito	629	896
Fallbrook	149	153
Bonsall	283	359
Pendleton-De Luz	12	12
Rainbow	13	13
Pala-Pauma	24	24
North Mountain	3	3
Valley Center	148	149
North County Metro	1,895	2,429
Julian	11	11
Desert	0	0
Mountain Empire	2	2
Jamul-Dulzura	81	81
Total	**5,662**	**7,432**

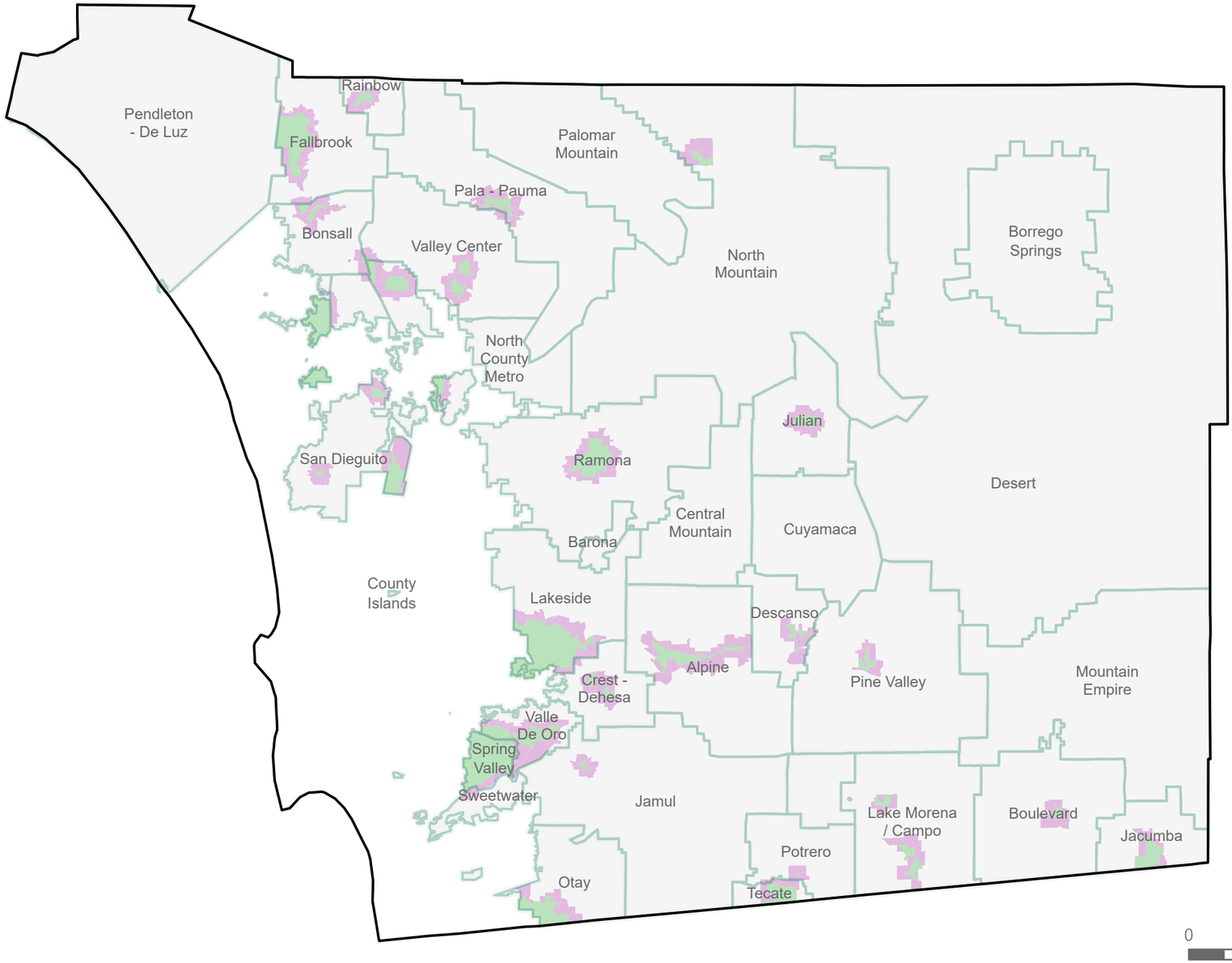
Source: SANDAG, Fehr & Peers.

Village Support Areas Alternative

This alternative assumes that all growth in housing in the unincorporated County will occur within designated villages or within a half-mile of those villages (collectively referred to as Village Support Areas). These areas are shown on **Figure 2**. The following changes were made to model land uses compared to the Project alternative:

- All unincorporated county growth was allocated to MGRAs which have centers in the Village Support Areas.
- No growth was moved to MGRAs in the Village Support Areas that are over 80% tribal, military, federal, or state land (not under County control).
- No growth was moved from unincorporated MGRAs that are over 90% tribal, military, federal, or state land (not under County control) with growth greater than 10 households.
- All growth was kept within the Community Plan Area where feasible. For example, growth outside the Village Support Areas in the Ramona CPA was moved to Village Support Areas within the Ramona CPA.
- Only the Barona, Desert, County Islands, and Pendleton – De Luz CPAs contained no Village Support Areas. Growth in these areas was manually assigned to the nearest Village Support Area.
- All growth moved to Village Support Area MGRAs within a given CPA was distributed proportionally based on land area of the MGRAs (uniformly increasing the density of the MGRAs).

Table 2 shows the number of households moved to Village Support Areas by CPA.



Legend

- SANDAG Region
- Community Plan Area
- Village Support Areas
- County Village Areas

Figure 2: County Village Areas and Village Support Areas

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Table 2: Households moved from CPAs to Village Support Areas

CPA	Number of Households Moved from a CPA to a Village Support Area	
	2035	2050
Spring Valley	0	0
Sweetwater	290	396
Otay	0	0
County Islands	142	161
Valle De Oro	122	232
Crest-Dehesa	17	18
Lakeside	51	69
Alpine	3	3
Barona	0	0
Ramona	115	118
Central Mountain	11	11
San Dieguito	257	434
Fallbrook	97	101
Bonsall	381	530
Pendleton-De Luz	18	18
Rainbow	8	8
Pala-Pauma	24	24
North Mountain	3	3
Valley Center	197	198
North County Metro	2,591	3,220
Julian	8	8
Desert	0	0
Mountain Empire	2	2
Jamul-Dulzura	149	150
Total	**4,486**	**5,704**

Source: SANDAG, Fehr & Peers.

Methodology for Determining Total VMT

Fehr & Peers utilized the model outputs for the CAP SEIR alternatives evaluate changes in VMT for the unincorporated County resulting from the alternatives. Total VMT and transportation metrics were evaluated for 2035 and 2050 conditions using the "CAP" method[1] as follows:

- Total VMT produced using the "CAP" method includes all internal VMT, ½ of internal to external VMT, and ½ of external to internal VMT. For example, all VMT originating from trips that start and end in the unincorporated area are included. One half of the VMT that originates in the unincorporated County but ends in one of the region's cities is included AND one half of the VMT that originates in one of the cities but ends in the unincorporated area is included.

Total VMT Generated (CAP)	All vehicle-trips are traced to the zone or zones of study. This includes internal to internal (II), 1/2 internal to external (IX), and 1/2 external to internal (XI) trips. May use final assignment origin-destination (OD) trip tables or production (P) and attraction (A) estimates multiplied by distance skims. When the model has multiple assignment periods, OD trip tables and congested skims from each period should be used.	

In addition, adjustments were made to account for military and tribal land, which is not within the County's jurisdiction. The *Military and Tribal VMT Adjustment for the San Diego County CAP Model Scenarios* (Fehr & Peers, February 2023) describes the process for the adjustment.

[1] "The "CAP" method for estimating total VMT is used throughout California and is the ICLEI (ICLEI-Local Governments for Sustainability) recommended methodology. In addition, it is documented in the SANDAG Regional Climate Action Planning Framework (ReCAP), December 2020, Appendix I, Pages 18-21.

Results

Table 4 shows base year CAP VMT as well as 2035 CAP VMT for the Project and three alternatives[2]. **Table 5** shows 2016 CAP VMT as well as 2050 CAP VMT for the Project and three alternatives.

Table 4: 2035 Total VMT

Alternative	Unincorporated County Total Weekday VMT[1]	Change from Project Alternative	Percent Change
Base Year (2016)	8,853,215	-	-
Project	9,635,081	0	0.0%
RTP SCS	8,892,653	-742,428	-7.71%
Fire Safe and VMT Efficient	9,583,847	-51,234	-0.53%
Village Support Areas	9,627,226	-7,855	-0.08%

Notes: [1] CAP VMT = II VMT + 1/2*IE VMT + 1/2*EI VMT
Source: SANDAG, Fehr & Peers.

Table 5: 2050 Total VMT

Alternative	Unincorporated County Total Weekday VMT[1]	Change from Project Alternative	Percent Change
2016	8,853,215	-	-
Project	10,216,009	0	0.0%
RTP SCS	9,247,568	-968,441	-9.48%
Fire Safe and VMT Efficient	10,174,451	-41,558	-0.41%
Village Support Areas	10,212,348	-3,661	-0.04%

Notes: [1] CAP VMT = II VMT + 1/2*IE VMT + 1/2*EI VMT
Source: SANDAG, Fehr & Peers.

The SCS Alternative results in the greatest reduction in VMT compared to the project. This is a result of a much smaller growth in households in the unincorporated County, inclusion of the Road User Charge, and significant investments and policy changes related to the transportation network (such as SANDAG's 5-Big Moves[3] which are part of the 2021 Regional Plan). These transportation network policies and network changes included in the SCS alternative result in

[2] VMT results for the Fire Safe and VMT Efficient alternative and Village Support Areas alternatives were calibrated to be consistent with results published for the County's CAP GHG Inventory sourced from model results provided directly from SANDAG. Each model run performed produces varied results since travel demand modeling is a simulation; therefore, the calibration was made to allow for direct comparison to the County's CAP GHG Inventory.

[3] SANDAG - 5 Big Moves

significant transportation mode shifts to transit, active transportation, and reduced driving in general.

The Fire Safe and VMT Efficient alternative results in a 0.53% reduction in unincorporated County VMT for 2035 and a 0.41% reduction in unincorporated County VMT for 2050. The Village Support Areas alternative results in a 0.08% reduction in total VMT in 2035 and a 0.04% reduction in total VMT in 2050. These changes appear very small; however, it is important to consider that in the base year (2016) the unincorporated County already generates approximately 8.8 million VMT. Only minor decreases in VMT associated with the existing population are expected due to the assumptions in the DS 39 version of the model, which is not the case under the SCS alternative since the policy assumptions result in large shifts in the existing population's travel choices. Therefore, Fehr & Peers expects the magnitude overall VMT reduction between the Project and these two alternatives to be small since the vast majority of unincorporated County VMT under future year alternatives can be attributed to existing land uses.

Another way to understand the VMT outcomes of moving land use within the County is to evaluate the VMT associated with the land use growth. For example, assuming the VMT associated with existing residents is held constant at the 2016 base year levels, the change in VMT from 2016 base year levels for the Project and each alternative would represent the VMT associated with new development beyond base year. This is shown in **Table 6** and **Table 7** for 2035 and 2050 respectively.

Focusing just on the growth in VMT since 2016, changes in VMT associated with the Fire Safe and VMT Efficient Areas alternative are more apparent. Growth in VMT is 6.6% lower than the Project for 2035 and 3.0% lower than the Project for 2050.

Table 6: 2035 Change in VMT compared to Project Growth in VMT

Alternative	Unincorporated County Weekday Total VMT[1]	Change in VMT from Base Year	Percent of Project Growth in VMT	Change in VMT Growth
Base Year (2016)	8,853,215	-	-	-
Project	9,635,081	781,866	100.0%	0.0%
RTP SCS	8,892,653	39,438	5.0%	-95.0%
Fire Safe and VMT Efficient	9,583,847	730,632	93.4%	-6.6%
Village Support Areas	9,627,226	774,011	99.0%	-1.0%

Notes: [1] CAP VMT = II VMT + 1/2*IE VMT + 1/2*EI VMT
Source: SANDAG, Fehr & Peers.

Table 6: 2050 Change in VMT compared to Project Growth in VMT

Alternative	Unincorporated County Total Weekday VMT[1]	Change in VMT from Base Year	Percent of Project Growth in VMT	Change in VMT Growth
Base Year (2016)	8,853,215	-	-	-
Project	10,216,009	1,362,794	100.0%	0.0%
RTP SCS	9,247,568	394,353	28.9%	-71.1%
Fire Safe and VMT Efficient	10,174,451	1,321,236	97.0%	-3.0%
Village Support Areas	10,212,348	1,359,133	99.7%	-0.3%

Notes: [1] CAP VMT = II VMT + 1/2*IE VMT + 1/2*EI VMT
Source: SANDAG, Fehr & Peers.

Growth in VMT for the Village Support Areas alternative is 1.0% lower than the Project for 2035 and 0.3% lower for 2050. While it may move households closer to retail, school, and other destinations, keeping the household growth in its respective CPA (or nearest CPA with a Village support area) likely has a limited effect on reducing commute distances.

For purposes of the analysis presented herein, households were moved to Village Support Areas within their original Community Plan Area in randomized process weighted to ensure approximately equal growth in density across a Village Support Area. Greater VMT benefits would likely occur if new households were concentrated in specific Village Support Areas, specifically in areas closer to incorporated areas. Growth in the Fire Safe and VMT Efficient alternative is concentrated closer to incorporated areas and the reduction in VMT compared to the project scenario is clear. A similar conclusion could be drawn if development was concentrated only in Village Support Areas overlapping VMT efficient areas that are fire safe.

Note that, while households were moved, socioeconomic data associated with those households was not changed. These household characteristics may vary from existing households in Fire Safe and VMT Efficient areas as well as Village Support Areas. While the change in location reduces trip lengths associated with the relocated households, it may not change the likelihood to use transit, to use alternative modes of transportation, or to commute a long distance to work using a personal vehicle.

Note that no employment changes associated with non-residential development were assumed in the modeling. The modeling reflects the highest VMT outcomes since it does not capture the typical benefits associated with mixed-use developments and neighborhood serving retail and focuses only on growth in housing units. Denser development for both the Fire Safe and VMT Efficient alternative as well as the Village Support Areas alternative would likely catalyze growth in employment and mixed-use development and would result in greater VMT benefits than shown.

Additional reductions in VMT could also occur if transportation network changes were made compared to the Project model scenario to encourage transit and active transportation.