



## FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

Project No. 416603  
SCH No. 2015021053

**SUBJECT:** **CLIMATE ACTION PLAN: CITY COUNCIL APPROVAL** for the adoption of the Climate Action Plan (CAP) and associated policies. Former Governor Arnold Schwarzenegger's Executive Order S-3-05 established the 2050 statewide greenhouse gas (GHG) reduction target of 80 percent below 1990 levels. In 2015, Governor Edmund G. Brown, Jr.'s Executive Order B-30-15 established the 2030 statewide GHG reduction target of 40 percent below 1990 levels. The City of San Diego has prepared a draft CAP that identifies measures to effectively meet GHG reduction targets for 2020, 2030, and 2035, as targets and interim targets for achieving the 2030 and 2050 State targets. The CAP estimates the GHG emissions for the City of San Diego in the baseline year 2010 (baseline) to be around 13.0 million metric tons of carbon dioxide equivalent (MMT CO<sub>2</sub>e). The CAP estimates the City's emissions would increase to approximately 14.1 MMT CO<sub>2</sub>e by 2020, 15.97 MMT CO<sub>2</sub>e by 2030, and 16.74 MMT CO<sub>2</sub>e by 2035. With implementation of the CAP, the City aims to reduce emissions 15 percent below the baseline to approximately 11.04 MMT CO<sub>2</sub>e by 2020, 40 percent below the baseline to approximately 7.8 MMT CO<sub>2</sub>e by 2030, and 50 percent below the baseline to approximately 6.5 MMT CO<sub>2</sub>e by 2035. With implementation of the CAP, it is anticipated that the City would exceed its reduction target by 1.23 MMT CO<sub>2</sub>e in 2020, ~~176,528~~ 211,196 metric tons (MT) CO<sub>2</sub>e in 2030, and ~~127,135~~ 205,462 MT CO<sub>2</sub>e in 2035. The CAP relies on significant City and regional actions, continued implementation of federal and state mandates, and five local strategies with associated action steps for target attainment. The five strategy areas are:

- Water & Energy Efficient Buildings;
- Clean & Renewable Energy;
- Bicycling, Walking, Transit & Land Use;
- Zero Waste (Gas & Waste Management); and
- Climate Resiliency.

Implementation of the CAP is divided into:

- Early Actions (Adoption of the CAP-December 31, 2017),
- Mid-Term Actions (January 1, 2018-December 31, 2020), and
- Longer-Term Actions (2021-2035).

~~Through 2020,~~ It is anticipated that with future implementing actions, the CAP would meet the requirements set forth in CEQA Guidelines Section 15183.5, whereby a lead agency (e.g. the City of San Diego) may analyze and mitigate the significant effects of GHG emissions at a programmatic level, such as in a general plan, a long range development plan,

or a separate plan to reduce GHG emissions. ~~Following adoption of the CAP, eligible individual projects preparing project-specific environmental documents may tier from and/or incorporate by reference the CAP's programmatic review of GHG impacts in their cumulative impacts analysis.~~

APPLICANT: City of San Diego – Planning Department

**Update 12/18/2014:**

**Minor revisions have been made to the Final Program Environmental Impact Report (PEIR) which are shown in a strikeout and underlined format. In accordance with California Environmental Quality Act (CEQA) Section 15073.5 (c)(4), the addition of new information that clarifies, amplifies, or makes insignificant modification does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is identification of new significant environmental impact or the addition of a new mitigation measure required to avoid a significant environmental impact.**

**CONCLUSIONS:**

Based on the analysis conducted for the project described above, the City has prepared the following Program Environmental Impact Report (PEIR) in accordance with the California Environmental Quality Act (CEQA) to inform public agency decision-makers and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project (State CEQA Guidelines Section 15121). As further described in the attached PEIR, the City has determined that the project would have a significant environmental effect in the following areas(s): **Land Use, Visual Effects and Neighborhood Character, Air Quality, Greenhouse Gases, Historical Resources, Transportation and Circulation, Utilities, and Water Supply.**

For impacts related to **Visual Effects and Neighborhood Character, Air Quality, Historical Resources, and Transportation and Circulation**, mitigation measures (Chapter 11) would not reduce program-level impacts to below a level of significance. The attached PEIR documents the reasons to support the above determination.

**MITIGATION, MONITORING AND PROGRAM:**

A series of mitigation measures are identified within each issue area discussion in the PEIR to reduce environmental impacts. The mitigation measures are also fully contained in Chapter 11, Mitigation Monitoring and Reporting Program, of the PEIR.

**RECOMMENDED ALTERNATIVES FOR REDUCING SIGNIFICANT UNMITIGATED IMPACTS:**

Based on the requirement that alternatives reduce significant impacts associated with the proposed project, the PEIR considers the following Project Alternatives which are further detailed in the Executive Summary and Chapter 8 of the PEIR:

1. No Project (Adopted General Plan)
2. Climate Mitigation and Adaptation Plan (CMAP)

Under CEQA Guideline Section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is environmentally superior. The PEIR identified the ~~proposed CAP~~ CMAP as the environmentally superior alternative because ~~both the No Project Alternative and the CMAP Alternative would have greater~~ fewer impacts related to GHGs Land Use, Visual Effects and Neighborhood Character, and Air Quality than the proposed CAP.

**PUBLIC REVIEW DISTRIBUTION:**

Individuals, organizations, and agencies that received a copy or notice of the Draft PEIR and were invited to comment on its accuracy and sufficiency is provided below. Copies of the Draft PEIR may be reviewed in the office of the Planning Department, or purchased for the cost of reproduction.

**RESULTS OF PUBLIC REVIEW:**

- ( ) No comments were received during the public input period.
- ( ) Comments were received but did not address the accuracy or completeness of the Draft Environmental Impact Report (EIR). No response is necessary and the letters are attached at the end of the EIR.
- (X) Comments addressing the accuracy or completeness of the Draft Environmental Impact Report (EIR) were received during the public input period. The letters and responses are located immediately after the EIR Distribution List.



Jeff Murphy, Director  
Planning Department

July 31, 2015  
Date of Draft Report

November 23, 2015  
Date of Final Report

Analyst: Rebecca Malone

## DISTRIBUTION OF DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT:

Copies of the Draft PEIR were distributed to the following individuals, organizations, and agencies:

### **DISTRIBUTION:**

#### **Federal Government**

US Environmental Protection Agency (19)

US Fish and Wildlife Service (23)

#### **State of California**

Caltrans, District 11 (31)

California Department of Fish and Wildlife (32)

California Natural Resources Agency (43)

Regional Water Quality Control Board: Region 9 (44)

Department of Water Resources (45)

State Clearinghouse (46)

California Coastal Commission (48)

State Water Resources Control Board (55)

Native American Heritage Commission (56)

Office of Planning and Research (57)

#### **County of San Diego**

Air Pollution Control District (65)

Department of Planning and Land Use (68)

County Water Authority (73)

Department of Environmental Health (75)

#### **City of San Diego**

Mayor's Office (91)

Council President Lightner, District 1

Councilmember Zapf, District 2

Councilmember Gloria, District 3

Councilmember Cole, District 4

Councilmember Kersey, District 5

Councilmember Cate, District 6

Councilmember Sherman, District 7

Councilmember Alvarez, District 8

Council President Pro Tem Emerald, District 9

City Attorney's Office (MS 59)

Amanda Guy

Heather Stroud

Heidi Vonblum

Planning Department

Tom Tomlinson, Interim Director

Nancy Bragado, Deputy Director

Brian Schoenfisch, Program Manager

Rebecca Malone, Associate Environmental Planner

Kurtis Steinert, Senior Environmental Planner  
Myra Herrmann, Senior Environmental Planner  
Seth Litchney, Senior Planner  
Kelley Stanco, Senior Planner—Historical Resources  
Jeff Harkness, Park Designer  
Susan Morrison, Associate Environmental Planner  
Jenny An, Urban Designer  
Cathy Winterrowd, Former Deputy Director

Development Services Department

Kerry Santoro, Deputy Director  
Martha Blake, Senior Planner  
Anna McPherson, Senior Planner  
Elizabeth Shearer-Nguyen, Senior Planner  
Jeff Szymanski, Senior Planner

Public Utilities Department

Nicole McGinnis  
Keli Balo

Public Works Department

Carrie Purcell

Environmental Services Department

Lisa Wood

Transportation and Storm Water Department

Mark Stephens

Park and Recreation Department

Kim Roeland

Libraries

Library Department—Gov. Documents (81)  
Central Library (81A)  
Balboa Branch (81B)  
Beckwourth Branch (81C)  
Benjamin Branch (81D)  
Carmel Mountain Ranch Branch (81E)  
Carmel Valley Ranch Branch (81F)  
City Heights/Weingart Branch (81G)  
Clairemont Branch (81H)  
College-Rolando Branch (81I)  
Kensington-Normal Heights Branch (81K)  
La Jolla/Riford Branch (81L)  
Linda Vista Branch (81M)  
Logan Heights Branch (81N)  
Malcolm X Library and Performing Arts Center (81O)  
Mira Mesa Branch (81P)  
Mission Hills Branch (81Q)  
Mission Valley Branch (81R)  
North Clairemont Branch (81S)  
North Park Branch (81T)  
Oak Park Branch (81U)  
Ocean Beach Branch (81V)

Otay Mesa-Nestor Branch (81W)  
Pacific Beach/Taylor Branch (81X)  
Paradise Hills Branch (81Y)  
Point Loma/Hervey Branch (81Z)  
Rancho Bernardo Branch (81AA)  
Rancho Penasquitos Branch (81BB)  
San Carlos Branch (81DD)  
San Ysidro Branch (81EE)  
Scripps Miramar Ranch Branch (81FF)  
Serra Mesa Branch (81GG)  
Skyline Hills Branch (81HH)  
Tierrasanta Branch (81II)  
University Community Branch (81JJ)  
North University Branch (81JJJ)  
University Heights Branch (81K)  
Malcolm A Love Library (457)

### **Other Governments**

City of Chula Vista (94)  
City of Coronado (95)  
City of Del Mar (96)  
City of El Cajon (97)  
City of Escondido (98)  
City of Imperial Beach (99)  
City of La Mesa (100)  
City of Lemon Grove (101)  
City of National City (102)  
City of Poway (103)  
City of Santee (104)  
City of Solana Beach (105)  
San Diego Association of Governments (108)  
San Diego Unified Port District (109)  
San Diego County Regional Airport Authority (110)  
Metropolitan Transit System (112/115)  
San Diego Gas & Electric (114)  
San Dieguito River Park JPA (116)

### **Other Interested Agencies, Organizations, and Individuals**

Community Groups, Associations, Boards, and Committees  
Community Planning Committee (194)  
Balboa Park Committee (226 and 226A)  
Black Mountain Ranch-Subara I (226C)  
Otay Mesa-Nestor Planning Committee (228)  
Otay Mesa Planning Committee (235)  
Clairemont Mesa Planning Committee (248)  
Greater Golden Hill Planning Committee (259)  
Serra Mesa Planning Committee (263A)  
Kearney Mesa Community Planning Group (265)

Linda Vista Community Planning Committee (267)  
La Jolla Community Planning Association (275)  
City Heights Area Planning Committee (287)  
Kensington-Talmadge Planning Committee (290)  
Normal Heights Community Planning Committee (291)  
Eastern Area Planning Committee (302)  
North Bay Community Planning Committee (307)  
Mira Mesa Community Planning Committee (310)  
Mission Beach Precise Planning Board (325)  
Navajo Community Planners, Inc. (336)  
Carmel Valley Community Planning Board (350)  
Del Mar Mesa Community Planning Board (361)  
North Park Planning Committee (363)  
Ocean Beach Planning Board (367)  
Old Town Community Planning Board (368)  
Pacific Beach Community Planning Committee (375)  
Pacific Highlands Ranch-Subarea III (377A)  
Rancho Penasquitos Planning Board (380)  
Peninsula Community Planning Board (390)  
Rancho Bernardo Community Planning Board (400)  
Sabre Springs Community Planning Group (406B)  
San Pasqual-Lake Hodges Planning Group (426)  
San Ysidro Planning and Development Group (433)  
Scripps Miramar Ranch Planning Group (437)  
Miramar Ranch North Planning Committee (439)  
Skyline Paradise Hills Planning Committee (443)  
Torrey Hills Community Planning Board (444A)  
Southeastern San Diego Planning Committee (449)  
Encanto Neighborhoods Community Planning Group (449A)  
College Area Community Planning Board (456)  
Tierrasanta Community Council (462)  
Torrey Highlands – Subarea IV (467)  
Torrey Pines Community Planning Board (469)  
University City Community Planning Group (480)  
Uptown Planners (498)

Town/Community Councils

Town Council Presidents Association (197)  
Barrio Station, Inc. (241)  
Downtown Community Council (243)  
Harborview Community Council (245)  
Clairemont Town Council (257)  
Serra Mesa Community Council (264)  
La Jolla Town Council (273)  
Rolando Community Council (288)  
Oak Park Community Council (298)  
Darnell Community Council (306)  
Mission Beach Town Council (326)  
Mission Valley Community Council (328C)

San Carlos Area Council (338)  
 Carmel Mountain Ranch Community Council (344)  
 Ocean Beach Town Council, Inc. (367A)  
 Pacific Beach Town Council (374)  
 Rancho Penasquitos Town Council (383)  
 Rancho Bernardo Community Council, Inc. (398)  
 San Dieguito Planning Group (412)  
 United Border Community Town Council (434)  
 Tierrasanta Community Council (462)  
 Murphy Canyon Community Council (463)  
 City of San Diego Sustainable Energy Advisory Board  
 The Beach and Bay Beacon News (137)  
 San Diego Chamber of Commerce (157)  
 Building Industry Association (158)  
 San Diego River Park Foundation (163)  
 San Diego River Coalition (164)  
 Sierra Club (165)  
 San Diego Canyonlands (165A)  
 San Diego Natural History Museum (166)  
 San Diego Audubon Society (167)  
 Jim Peugh (167A)  
 San Diego River Conservancy (168)  
 Environmental Health Coalition (169)  
 Citizens Coordinate for Century 3 (179)  
 Endangered Habitats League (182 & 182A)  
 San Diego Tracking Team (187)  
 League of Women Voters (192)  
 National City Chamber of Commerce (200)  
 Carmen Lucas (206)  
 South Coastal Information Center (210)  
 San Diego Historical Society (211)  
 San Diego Archaeological Center (212)  
 Save Our Heritage Organization (214)  
 Ron Chrisman (215)  
 Clint Linton (215B)  
 Frank Brown - Inter-Tribal Cultural Resource Council (216)  
 Campo Band of Mission Indians (217)  
 San Diego County Archaeological Society Inc. (218)  
 Kuumeyaay Cultural Heritage Preservation (223)  
 Kuumeyaay Cultural Repatriation Committee (225)  
 Native American Distribution  
     Barona Group of Capitan Grande Band of Mission Indians (225A)  
     Campo Band of Mission Indians (225B)  
     Ewiiapaayp Band of Mission Indians (225C)  
     Inaja Band of Mission Indians (225D)  
     Jamul Indian Village (225E)  
     La Posta Band of Mission Indians (225F)  
     Manzanita Band of Mission Indians (225G)

Sycuan Band of Mission Indians (225H)  
Viejas Group of Capitan Grande Band of Mission Indians (225I)  
Mesa Grande Band of Mission Indians (225J)  
San Pasqual Band of Mission Indians (225K)  
Ipai Nation of Santa Ysabel (225L)  
La Jolla Band of Mission Indians (225M)  
Pala Band of Mission Indians (225N)  
Pauma Band of Mission Indians (225O)  
Pechanga Band of Mission Indians (225P)  
Rincon Band of Luiseno Indians (225Q)  
San Luis Rey Band of Luiseno Indians (225R)  
Los Coyotes Band of Mission Indians (225S)

San Diego Apartment Association  
Building Owners and Managers Association  
San Diego Association of Realtors  
Industrial Environmental Association  
NAIOP San Diego  
Urban Land Institute  
American Institute of Architects, San Diego Chapter  
Coastal and Estuarine Research Federation  
The Nature Conservancy  
Walk San Diego  
Bike San Diego  
American Lung Association  
Community Forest Advisory Board  
Green Edge Technology  
San Diego 350  
Diane Coombs  
Landry Watson  
Nicole Capretz  
Nicola Hedge  
Doug Smith  
Bill Powers  
Elyse Lowe  
Angie Mei  
Dr. D. Bart Chadwick  
Joan Raphael  
Masada Disenhouse  
Angela Deegan  
Grace Van Thillo  
Janina Moretti  
Philip Petrie  
Lyla Fadali  
Mike Bullock  
Kath Rogers  
Chandra Slaven  
Monique Lopez  
Melanie Tylke  
Jean Costa

Joe LaCava  
Kayla Race  
Micah Mitrosky  
Nick Ervin  
Rena Marrocco  
Colleen DieTzel  
Sylvia Ollinger  
Rodrigo De La Rosa  
Rosario Garcia  
Luz Palomino  
Raymond Paulson  
Phil Petrie  
Louise Russell  
Angela Deegan  
Kimberly McGinley  
Douglas Kot  
Mary Lou Finley  
Kathy Smith  
Carolina Martinez  
Gina Schumacher  
Masada Disenhouse  
Patricia Gracian  
Huge Moore  
Bob Silvern  
Ashley Manzanec  
Sam Ballard  
Richard Hoverstock  
Janina Moretti  
Tasha Zogo  
Ken Brucker  
Michael Brackney  
Jack Shu  
Susan Randerson  
Roddy Jerome  
Adriana Covarrubias  
Norma Norega  
Joy Williams  
Gaby Schubert  
James Lawson  
Craig Benedetto

# **RESPONSE TO COMMENTS ON THE DRAFT EIR**

The Draft Environmental Impact Report (Draft EIR) for the Climate Action Plan was distributed for public review on July 31, 2015, initiating a 60-day public review period ending on September 29, 2015. The document was made available online, at 37 public libraries throughout the City of San Diego, and at the City of San Diego’s Planning Department. During the public review period, a total of 36 letters and emails were received before the close of the public comment period. Pursuant to California Environmental Quality Act (CEQA) Guidelines §15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” All comment letters received on the Climate Action Plan Draft EIR were evaluated for environmental issues, and written responses to comments on the environmental issues were prepared.

**Table 1** provides a list of the comment letters received, including details on the agency, organization, or individual that submitted the letter and the date of the letter. For organizational purposes, each letter has been assigned a letter identification as outlined in Table 1. Each comment letter is reproduced in its entirety and is aligned side-by-side with the response(s) to the letter. Where a commenter has provided multiple comments, each comment is indicated by a line bracket and an identifying number in the margin of the comment letter.

**TABLE 1**  
**LIST OF COMMENT LETTERS ON THE CLIMATE ACTION PLAN DRAFT PROGRAM EIR**

<b>Letter No.</b>	<b>Agency/Organization/Individual</b>	<b>Letter Date</b>	<b>Page No.</b>
A	State Clearinghouse	NA	RTC-1
B	Art Harrison	Aug. 4, 2015	RTC-3
C	WaterSmart Software	Aug. 4, 2015	RTC-4
D	Thomas J. Sun	Aug. 6, 2015	RTC-6
E	Jim Bell	Aug. 9, 2015	RTC-7
F	Caltrans	Aug. 27, 2015	RTC-8
G	Ellen McCann	Sep. 9, 2015	RTC-10
H	California Department of Fish and Wildlife	Sep. 14, 2015	RTC-11
I	Elaine and Howard Maltz	Sep. 15, 2015	RTC-13
J	Peninsula Community Planning Board	Sep. 17, 2015	RTC-14
K	Center for Sustainable Energy	Sep. 22, 2015	RTC-18
L	Community Energy Action Network	Sep. 24, 2015	RTC-21
M	Donna Shanske	Sep. 27, 2015	RTC-25
N	Bill Tippetts	Sep. 28, 2015	RTC-26
O	Green Cities California	Sep. 28, 2015	RTC-37
P	San Diego Unified Council of PTAs	Sep. 28, 2015	RTC-38
Q	San Diego 350	Sep. 28, 2015	RTC-39
R	SolarCity	Sep. 28, 2015	RTC-41
S	Sustainable Energy Advisory Board	Sep. 28, 2015	RTC-43
T	Erika Morgan	Sep. 28, 2015	RTC-47
U	Environmental and Economic Sustainability Task Force	Sep. 28, 2015	RTC-49
V	Dorothy Gesick	Sep. 29, 2015	RTC-53
W	Catheryn Mullinger	Sep. 29, 2015	RTC-54
X	William F. Avrin	Sep. 29, 2015	RTC-55
Y	Climate Action Campaign	Sep. 29, 2015	RTC-56
Z	Carlos F. Cabezud	Sep. 29, 2015	RTC-60
AA	San Diego Gas and Electric	Sep. 29, 2015	RTC-61
AB	Colleen Dietzel	Sep. 29, 2015	RTC-70
AC	Building Industry Association	Sep. 29, 2015	RTC-71
AD	Environmental Health Coalition	Sep. 29, 2015	RTC-75
AE	Boulevard Planning Group	Sep. 29, 2015	RTC-98
AF	CERF	Sep. 29, 2015	RTC-113
AG	Sierra Club of San Diego	Sep. 29, 2015	RTC-118
AH	Community Forest Advisory Board	Sep. 29, 2015	RTC-140
AI	Circulate San Diego	Sep. 29, 2015	RTC-146
AJ	Rancho Bernardo Community Planning Board	Sep. 17, 2015	RTC-149

## Comment Letter A

## Response to Comment Letter A

Comment noted.

<div data-bbox="163 289 264 391" data-label="Image"></div> <div data-bbox="144 394 296 427" data-label="Text"> <p>EDMUND G. BROWN JR. GOVERNOR</p> </div> <div data-bbox="323 303 798 391" data-label="Section-Header"> <p>STATE OF CALIFORNIA GOVERNOR'S OFFICE of PLANNING AND RESEARCH STATE CLEARINGHOUSE AND PLANNING UNIT</p> </div> <div data-bbox="846 289 953 391" data-label="Image"></div> <div data-bbox="863 394 926 427" data-label="Text"> <p>KEN ALEX DIRECTOR</p> </div> <div data-bbox="241 436 378 459" data-label="Text"> <p>September 15, 2015</p> </div> <div data-bbox="241 506 426 583" data-label="Text"> <p>Rebecca Malone City of San Diego 1222 First Avenue, MS-501 San Diego, CA 92101</p> </div> <div data-bbox="241 594 436 634" data-label="Text"> <p>Subject: Climate Action Plan SCH#: 2015021053</p> </div> <div data-bbox="241 647 392 669" data-label="Text"> <p>Dear Rebecca Malone:</p> </div> <div data-bbox="241 682 898 795" data-label="Text"> <p>The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on September 14, 2015, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.</p> </div> <div data-bbox="241 807 774 829" data-label="Text"> <p>Please note that Section 21104(e) of the California Public Resources Code states that:</p> </div> <div data-bbox="296 842 888 917" data-label="Text"> <p>"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."</p> </div> <div data-bbox="241 930 903 989" data-label="Text"> <p>These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.</p> </div> <div data-bbox="241 1000 898 1076" data-label="Text"> <p>This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.</p> </div> <div data-bbox="241 1091 310 1110" data-label="Text"> <p>Sincerely,</p> </div> <div data-bbox="256 1088 499 1156" data-label="Text">  </div> <div data-bbox="241 1161 434 1200" data-label="Caption"> <p>Scott Morgan Director, State Clearinghouse</p> </div> <div data-bbox="241 1230 392 1271" data-label="Text"> <p>Enclosures cc: Resources Agency</p> </div> <div data-bbox="340 1318 764 1364" data-label="Text"> <p>1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044 (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov</p> </div>	<div data-bbox="1050 175 1463 209" data-label="Section-Header">Response to Comment Letter A</div> <div data-bbox="1050 219 1260 250" data-label="Text">Comment noted.</div>
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## Comment Letter A

Document Details Report  
State Clearinghouse Data Base

**SCH#** 2015021053  
**Project Title** Climate Action Plan  
**Lead Agency** San Diego, City of

**Type** EIR Draft EIR

**Description** The CAP has been developed in response to State legislation and policies that are aimed at reducing CA's GHGE. This includes EO S-3-05, which established the 2050 statewide GHG reduction target of 80 percent below 1990 levels, EO B-30-15, which established the 2030 statewide GHG reduction target of 40 percent below 1990 levels, and AB 32, the Global Warming Solutions Act, which tasked the California Air Resources Board with creating the Climate Change Scoping Plan (Scoping Plan) to establish a 2020 interim target and to provide a path for local governments to contribute their fair share of the GHGE reductions necessary to achieve the target.

**Lead Agency Contact**

**Name** Rebecca Malone  
**Agency** City of San Diego  
**Phone** 61-446-5371 **Fax**  
**email**  
**Address** 1222 First Avenue, MS-501  
**City** San Diego **State** CA **Zip** 92101

**Project Location**

**County** San Diego  
**City**  
**Region**  
**Lat / Long**  
**Cross Streets** Citywide  
**Parcel No.**  
**Township**

	Range	Section	Base

**Proximity to:**

**Highways** I-5, I-15, I-805, SR-52, SR-94, SR905  
**Airports** Lindbergh Field, Miramar  
**Railways** San Diego Trolley  
**Waterways** Pacific Ocean, San Diego Bay, Mission Bay, San Diego River, Lake Murray, San Vicente Reservoir,  
**Schools** Multiple  
**Land Use** Various Land Uses, zoning and GP designations intersect with the program elements.

**Project Issues** Air Quality; Archaeologic-Historic; Solid Waste; Traffic/Circulation; Water Supply; Growth Inducing; Landuse; Cumulative Effects; Other Issues

**Reviewing Agencies** Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; Cal Fire; Caltrans, District 11; Air Resources Board, Transportation Projects; Air Resources Board, Major Industrial Projects; Regional Water Quality Control Board, Region 9; California Energy Commission; Native American Heritage Commission; Public Utilities Commission

**Date Received** 07/31/2015 **Start of Review** 07/31/2015 **End of Review** 09/14/2015

Note: Blanks in data fields result from insufficient information provided by lead agency.

LETTER

RESPONSE

Comment Letter B

From: Art Harrison  
To: DSD EAS  
Subject: Draft CAP  
Date: Tuesday, August 04, 2015 10:23:09 AM

Ms. Malone,

Thank you for sending me the draft plan. As I read through, I found very little but vague promises and nods to the various "stakeholders". Some of these (urban forest and bike trails) might increase greenhouse gases by the inefficiencies they introduce.

As a "real person" not a stakeholder/special interest group, some things I would like to see are:

Reduction in traffic calming. This reduces inefficiencies.

Intelligent traffic grid (timing by computer of lights). This also reduces inefficiencies.

Road repair. This reduces costs in auto repairs to all San Diego citizens regardless of income but advantages older vehicles operated by lower income.

These are three ideas of the top of my head ( no they are from President Carter's 1975 energy independence program). I am a retired grocery clerk.

My question to you, why is the city's program just seem to be the usual handouts to the special interest groups.

By the way, how much did this feel good draft plan cost between the consultants and the city's planning department? The answer to this question is the reason for my scepticism.

Sincerely,

Capt. Art Harrison (former member of the NHPG)

B-1  
B-2  
B-3

Response to Comment B-1

Comment noted. CAP strategies are identified in CAP Chapter 3, and the environmental impacts of implementation of those strategies are discussed in Draft EIR Chapter 3. CAP Chapter 3 also establishes a monitoring and reporting mechanism to ensure successful implementation of the CAP.

Response to Comment B-2

Comment noted.

The CAP has been developed in response to State legislation and policies that are aimed at reducing California's greenhouse gas (GHG) emissions. This includes Executive Order S-3-05, which established the 2050 statewide GHG reduction target of 80 percent below 1990 levels, Executive Order B-30-15, which established the 2030 statewide GHG reduction target of 40 percent below 1990 levels, and Assembly Bill 32, the Global Warming Solutions Act, which tasked the California Air Resources Board (CARB) with creating the Climate Change Scoping Plan (Scoping Plan) to establish a 2020 interim target and to provide a path for local governments to contribute their fair share of the GHG emission reductions necessary to achieve the target.

The CAP was developed to achieve the statewide mandates and was developed to serve the interests of all residents in the City of San Diego.

Response to Comment B-3

Comment noted. This comment does not address the adequacy of the Draft EIR.

Comment Letter C



20 California Street, Suite 200  
San Francisco, CA 94111  
415.366.8622  
WaterSmart.com

Rebecca Malone, Associate Planner  
City of San Diego Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

August 4, 2015

Dear Ms. Malone,

Thank you for the opportunity to comment on San Diego's July 2015 Draft Climate Action Plan. The Plan will do much to reduce greenhouse gas emissions in the City and create a sustainable future for San Diego. In particular, WaterSmart Software applauds the City's attention to the water-energy nexus, recognizing that reducing water consumption can reduce energy use and the associated greenhouse gas emissions. We recommend including the deployment of water-use monitoring software as a strategy for reducing water and energy consumption.

As the Plan notes, there is a robust nexus between water, energy, and greenhouse gas emissions. About 20% of California's total electricity use and 30% of the natural gas use (not related to power production) goes toward moving, heating, and treating water around the state.<sup>1</sup> In order to reduce greenhouse gas emissions in this sector, the Plan highlights the importance of energy and water efficient buildings and puts forth methods by which to "reduce daily per capita water consumption."

Water-use monitoring software technology is an example of a proven, cost-effective water efficiency and conservation tool that can reduce water demand and related greenhouse gas emissions. Water-use monitoring software, using social norm comparisons, allows water utilities to better educate their customers about how much water they use, how their water use compares to that of others, and what personalized actions can best save water, energy, and money.

Increasing public education and awareness with more precise and comparative information on water-use through deploying monitoring software has been proven by independent evaluations to reduce water demand by 4.6% to 6.6% within the first 6 to 12 months.<sup>2</sup> In addition, customers participating in the project and

<sup>1</sup> <http://www.energy.ca.gov/research/iaw/water.html>  
<sup>2</sup> California Water Foundation, 2013  
[http://californiawaterfoundation.org/uploads/1389391749-Watersmart\\_evaluation\\_report\\_FINAL\\_12-12-13\(00238356\).pdf](http://californiawaterfoundation.org/uploads/1389391749-Watersmart_evaluation_report_FINAL_12-12-13(00238356).pdf)

C-1



Response to Comment C-1

Comment noted. This comment does not address the adequacy of the Draft EIR.

Comment Letter C

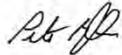
receiving social-norms based messaging are between two and six times as likely to participate in water conservation programs offered by the utility, such as appliance rebates, on-site water evaluations, and landscape conversions, further reducing demand for water and energy and providing additional GHG emission reductions.

A half-dozen providers, partnering with over 40 water suppliers across the state, currently offer water-use monitoring software. The Governor's Executive Order B-29-15, implementing the Water Energy Technology (WET) Program, recognizes that investment in new technologies, including "water-use monitoring software," is necessary to reduce statewide water and energy use and related greenhouse gas emissions.

The Plan already includes a "Smart Energy Management and Monitoring System" as one measure to track energy consumption and reduce demand. Water-use monitoring software can similarly provide important greenhouse gas emission reductions through water and related energy savings.

Thank you again for the opportunity to comment on this valuable plan to reduce greenhouse gas emissions in San Diego. Please let us know if there is any other information we can provide.

Sincerely,



Peter Yolles  
Founder  
WaterSmart Software

C-1



Comment Letter D

**From:** [Thomas Sun](#)  
**To:** [DSD EAS](#)  
**Subject:** San Diego Draft Climate Action Plan: Student Feedback  
**Date:** Thursday, August 06, 2015 4:20:26 PM

Good Afternoon Rebecca Malone,

My name is Tom and I am an undergraduate student at UCSD. I had some feedback about the draft SD CAP that I hope you can take into consideration for its next stages.

**Water:**

Most of the discussion of SD's water plans revolved around supporting state and federal initiatives. As one of the driest, large cities in SoCal, we need to be leaders on this issue, rather than followers. The implementation of Potable Reuse (Direct and Indirect) should be part of our plan to wean off our dependence on energy costly imported water.

**Transportation:**

There is not enough emphasis on the SD Trolley. As a long time resident of Los Angeles, I was greatly disappointed in the state of SD's light rail system. Considering SD's hilly topography, the Trolley should be invested as its top priority in transportation plans.

**City Planning:**

Smart Growth planning must be institutionalized into the city's long term growth plan. SD cannot continue to grow sparsely. This has been proven to be an incorrect city planning policy and must be replaced with Smart Growth ASAP.

Please let me know if any of my recommendations comes into talks for the next phase of the CAP draft.

Thank you,  
Tom

**Thomas J. Sun**

University of California, San Diego  
Jacobs School of Engineering  
Candidate: B.S. Environmental Engineering '17  
Cell: 626-379-6633 Fax: (213)928-9768

D-1

**Response to Comment D-1**

This comment does not address the adequacy of the Draft EIR. Comment noted. The CAP identifies five primary strategies implemented by 17 actions and 32 supporting measures to meet specified targets.

The primary strategies include actions that support City-wide water conservation efforts, multi-modes of transportation, and actions that promote the effective land uses needed to reduce vehicle miles traveled. The following CAP actions and strategies relating to water conservation, multimodal transportation and land use are briefly described below. Potential impacts associated with implementation of the CAP actions and strategies are addressed in the Draft EIR. In particular, please refer to Actions 1.3, 1.4, 1.5, and 3.1-3.6.

LETTER

RESPONSE

Comment Letter E

**From:** [Jim Bell](#)  
**To:** [DSD EAS](#)  
**Subject:** Sustainability  
**Date:** Sunday, August 09, 2015 10:49:43 AM  
**Attachments:** [C&K English doc.odf](#)

---

Hi Rebecca,

I applaud the city's move toward a more sustainable economy, but if we want to lead the world in this endeavor, the attachment above shows the way. Titled "Consciousness & Knowledge," in 12 pages of text and graphics the paper lays out the minimum that those alive over the next 60 years need to accomplish and how to cost-effectively accomplish them – to improve contemporary life and to leave our descendants their best to live in a peaceful, prosperous and live-support sustaining future.

The plans focus is global, but it uses the San Diego/Tijuana Region to show how a particular region with its situation can become cost-effectively renewable energy, water and food self-sufficient. Please give it a good read. If you like it, please pass it along. FYI –The paper has already been translated into Spanish and Chinese an a Portuguese version is in the works. All the completed versions are free at [jimbelle.com](http://jimbelle.com), click on the "Consciousness & Knowledge" language heading.

All the best in your life and work,  
Jim Bell, 619-758-9020

E-1

Response to Comment E-1

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter F

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11, DIVISION OF PLANNING
4050 TAYLOR ST, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 688-4960
FAX (619) 688-4299
TTY 711
www.dot.ca.gov



Serious drought.
Help save water!

August 27, 2015

11-SD-VAR
San Diego Climate Action Plan
Draft PEIR
SCH #2015021053

Mrs. Rebecca Malone
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Mrs. Malone:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of San Diego's (City) Draft Climate Action Plan (CAP). 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 of infill, conservation, and efficient development. To ensure a safe, efficient, and reliable transportation system, we encourage early consultation and coordination with local jurisdictions and project proponents on all development projects that utilize the multi-modal transportation network.

Caltrans has reviewed the Draft CAP and the CAP Draft Program Environmental Impact Report (PEIR) dated July 2015, and has the following comments:

Caltrans encourages the City to coordinate with the San Diego Association of Governments (SANDAG) and their Sustainable Communities Strategy (SCS) efforts, to address regional strategies to reduce greenhouse gases (GHG) and Vehicle Miles Travel (VMT). The Draft CAP's proposed actions coordinate with the GHG emission reduction efforts as outlined in the adopted SCS for the 2050 Regional Transportation Plan.

F-1

Caltrans commends the City for the CAP's proposed implementation of the City's existing Pedestrian Master Plan (Action 3.2) and Bicycle Master Plan (Action 3.3). Furthermore, Caltrans recommends coordination with the City on the proposed implementation of a future Traffic Signal Master Plan (Action 3.4) and a Roundabouts Master Plan (Action 3.5) for locations where a traffic signal retiming or roundabout installation may impact the State Highway System.

F-2

Caltrans recognizes that 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 total vehicle miles traveled and the number of

F-3

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Response to Comment F-1

The 2050 RTP/SCS forecasts population and employment growth in the region and establishes a regional plan for future land use and transportation system improvements that would reduce GHG emissions from passenger vehicles and light trucks.

For the 2050 RTP/SCS, SANDAG staff worked directly with local jurisdictions, including the City of San Diego staff, to include land use and transportation data into the 2050 Regional Growth Forecast. The City will continue to coordinate with SANDAG and its Sustainable Communities Strategy efforts.

Response to Comment F-2

Comment noted.

Response to Comment F-3

The CAP includes actions and strategies (see CAP Action 3.1) that implement the General Plan's Mobility Element and the City of Villages strategy in Transit Priority Areas to increase the use of transit.

Comment Letter F

Mrs. Rebecca Malone  
August 27, 2015  
Page 2

trips. Caltrans strongly encourages local agencies to work towards a safe, functional, interconnected, multi-modal system.

↑  
F-3

Caltrans appreciates the continued coordination with City staff on the CAP. If you have any questions, please contact Jose Marquez at (619) 688-3193.

Sincerely,



JACOB ARMSTRONG, Branch Chief  
Development Review Branch

c: State Clearinghouse

*"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability."*

Comment Letter G

**From:** Ellen  
**To:** DSD EAS  
**Cc:** Mayor Kevin Faulconer; Councilmember Sherril Lightner; CouncilMember Lona Zapf; Councilmember Todd Gloria; Councilmember Myrtle Cole; Councilmember Mark Kerssev; CouncilMember Chris Cate; Councilmember Scott Sherman; CouncilMember David Alvarez  
**Subject:** San Diego Climate Action Plan: Put Our Neighborhoods First for Climate Action  
**Date:** Wednesday, September 09, 2015 3:53:52 PM

RE: San Diego Climate Action Plan: Put Our Neighborhoods First for Climate Action

Dear San Diego Mayor Faulconer, City Councilmembers and Planning Department,

I urge you to approve an enforceable and comprehensive Climate Action Plan that commits to climate justice and protects, invests in, and takes action first in neighborhoods that are impacted first and worst by climate change and pollution.

The Climate Action Plan should be strengthened to achieve:

- **Transportation justice:** Invest in transit, bicycling, and pedestrian infrastructure in our neighborhoods first, and put people and transit before freeways
- **Energy justice:** Put solar in our neighborhoods, give San Diegans a clean energy choice, and require buildings to be energy efficient
- **Jobs:** Create good-paying jobs for local residents
- **Climate change resilience:** Protect our natural resources, wildlife, coastline, infrastructure, and public health from the harmful impacts of climate change
- **Achieve bold goals and comply with local and state laws:** Meet or exceed the draft climate plan’s goals to cut carbon in half, use alternative transit for half of commutes, use 100 percent clean energy, increase our urban forests and parks and reduce waste.

G-1

The Climate Action Plan’s environmental review should analyze and endorse these recommendations to protect and prioritize neighborhoods that are most impacted by climate change.

Thank you for supporting a healthy, sustainable, and just future for San Diego.

Sincerely,

Ellen

ellenmccann63@hotmail.com  
1262 Amalfi Pl.

Escondido, CA, 92027

Response to Comment G-1

The Draft EIR analyzes the environmental effects of implementation of the CAP.



State of California – Natural Resources Agency  
**DEPARTMENT OF FISH AND WILDLIFE**  
 South Coast Region  
 3863 Ruffin Road  
 San Diego, CA 92123  
 (858) 467-4201  
 www.wildlife.ca.gov

#### Comment Letter H

*EDMUND G. BROWN JR., Governor*  
*CHARLTON H. BONHAM, Director*



September 14, 2015

Ms. Rebecca Malone  
 City of San Diego  
 1222 First Avenue, MS 501  
 San Diego, CA 92101  
 Email: DSDEAS@sandiego.gov

**Subject: Comments on the Draft Programmatic Environmental Impact Report,  
 Climate Action Plan; City of San Diego, County of San Diego  
 (SCH # 2015021053) Project Number 416603**

Dear Ms. Malone:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced Draft Programmatic Environmental Impact Report (DPEIR) prepared by the City of San Diego Planning Department (City) pursuant to the California Environmental Quality Act (CEQA). The Climate Action Plan (CAP) prepared by the City of San Diego (Proposed Project) would allow for the adoption of the CAP and associated policies to reduce Greenhouse Gas (GHG) emissions. The City participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

Former Governor Arnold Schwarzenegger's Executive Order S-3-05 established the 2050 statewide GHG reduction target of 80 percent below 1990 levels. Governor Edmund G. Brown Jr.'s 2015 Executive Order B-30-15 established the 2030 statewide GHG reduction target of 40 percent below 1990 levels. The City has developed the Proposed Project to identify measures to comply with GHG reduction targets and anticipates exceeding its' GHG emission reduction targets through implementation of the CAP. The CAP would be implemented through Early Actions (Beginning December 31, 2017), Mid-Term Actions (January 1, 2018 – December 31, 2020), and Longer-Term Actions (2021 – 2035). The CAP relies on City and regional actions, continued implementation of federal and state mandates, and five local strategies with associated action steps. The City has identified the following five strategy areas:

- Water Energy Efficient Buildings;
- Clean and Renewable Energy;
- Zero Waste (Gas and Waste Management); and,
- Climate Resiliency.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act ([CESA] Fish and Game Code § 2050 *et seq.*) and Fish and Game Code section 1600 *et seq.* It is the policy of the Department to promote and foster the development of planning strategies at the ecosystem level through active participation in local development of regional Natural Community Conservation Plan (NCCPs), which often include innovative multiple species habitat conservation planning efforts (e.g., MSCP). The success of these plans is reliant on maintaining core biological resource

*Conserving California's Wildlife Since 1870*

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Comment Letter H

Ms. Rebecca Malone  
City of San Diego  
September 14, 2015  
Page 2 of 2

areas and habitat linkages that are essential to the long-term biological viability of associated flora and fauna.

**MSCP Consistency.** As a component of the CAP's Strategy 2, *Clean Renewable Energy* the City would strive to achieve one hundred percent renewable energy supply to its electrical grid by the year 2035. The Department commends efforts to encourage sustainable green energy production, including the utilization of distributed-rooftop energy solutions because it co-locates energy production with existing development, thereby minimizing habitat loss associated with the physical footprint of the energy production itself.

H-1

According to the DPEIR (a Supporting Measure of Action 2.1), the CAP intends to "E[estab]lish policies, programs and ordinances that facilitate and promote siting of new onsite photovoltaic energy generation and energy storage systems". As stated above, the Department encourages renewable energy development which has been designed to minimize potential biological affects, particularly permissible land uses that minimize habitat disturbances. In addition, the Department recommends that the DPEIR include a discussion that demonstrates how the CAP is consistent with the City's MSCP Subarea Plan and Multi-Habitat Planning Area (MHPA). This should include demonstrating that the CAP would not adversely affect protections of the preserve system by directing development of renewable energy facilities within areas identified for preservation (Implementing Agreement, section 10.2 *et seq.*)<sup>1</sup>. The Department recommends that the CAP is specific in promoting renewable energy installations outside of the MHPA as ancillary configurations coincident with the physical dimensions of existing structures. For example, we would anticipate that renewable energy installations would occur on existing structures as opposed to siting new renewable energy installations within native habitat or MHPA.

H-2

We appreciate the opportunity to comment on the DPEIR for this Proposed Project and to assist the City in further minimizing and mitigating project impacts to biological resources. The Department requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of the forthcoming hearing date for the project (CEQA Guidelines: §15073(e)). If you have any questions or comments regarding this letter, please contact Eric Weiss, Senior Environmental Scientist (Specialist) at Eric.Weiss@wildlife.ca.gov or (858) 467-4289.

Sincerely,

Betty J. Courtney  
Environmental Program Manager I  
South Coast Region

cc: Erinn Wilson, CDFW, Los Alamitos  
State Clearinghouse, Sacramento

<sup>1</sup> 1997 Implementing Agreement by and between United States Fish and Wildlife Service, California Department of Fish and Game, and City of San Diego to establish a multiple species conservation program ("MSCP") for the conservation of threatened, endangered, and other species in the vicinity of San Diego, California.

Response to Comment H-1

Comment noted.

Response to Comment H-2

Biological resources were addressed in Section 6.0 of the Draft EIR (Effects Found not to be Significant). This chapter discusses the environmental issue areas where impacts were found to not be significant. These discussions address the CEQA checklist questions and thresholds developed by the City of San Diego for each of the environmental topic areas. The discussion of the proposed CAP's consistency with the City's MSCP Subarea Plan and Multi-Habitat Planning Area (MHPA) (as discussed on Page 7-4 of the Draft EIR) are summarized below.

Action 2.1 of the CAP targets achievement of a 100 percent renewable supply of electricity by 2035 through consideration of a CCA or other program. While the CAP does not propose to construct any site-specific renewable energy infrastructure projects, this Action could result in the development of small-scale renewable energy systems (such as residential and commercial roof-top solar PV systems). This type of small-scale project would generally result in minimal environmental impacts. There is the potential, however, for development of renewable energy facilities in undeveloped areas and more sensitive areas, both within and outside the City limits. Within the City limits, any such development would be subject to the restrictions and requirements of the MSCP Subarea Plan, ESL ordinance, and the Biology Guidelines. Such projects would be required to comply with the MSCP Land Use Adjacency Guidelines, which require all projects to ensure that site drainage is not directed into MSCP lands, measures are incorporated to reduce potential for chemicals to enter the MHPA lands, lighting is directed away from MHPA lands and buffered by landscaping where possible, noises are minimized and excessive noise during the breeding season is curtailed, and barriers are constructed along new development to protect MHPA lands from the public. Any renewable energy project proposed to implement CAP Action 2.1 would be subject to the ESL Ordinance, Section 143.01 of the Land Development Code, which would reduce impacts to these areas. Therefore, conflicts or inconsistencies with these plans are not expected to occur within the City and are not expected to have a substantial adverse impact on any species identified as a candidate, sensitive or special status species.

Comment Letter I

From: Elaine & Howard Maltz  
To: DSD EAS  
Subject: Climate Action Plan for 2035  
Date: Tuesday, September 15, 2015 1:19:40 PM

Attention: Rebecca Malone, Associate Planner City of San Diego

We are writing in regard to the Climate Action Plan for 2035:

- We support a **binding** goal to reduce our carbon footprint by half by 2035.
- We support using 100% clean energy.
- We support using **only** Community Choice Aggregation, a local entity, as a vehicle for ensuring the above.
- We support the increased implementation of public transportation. We would especially like to see the restoration of the bus route going up Nautilus Street in La Jolla. With several stops along the way, it could enable many to walk out to Nautilus, take a bus and transfer to another bus which could take them into downtown San Diego.

I-1

We are excited at the prospect that San Diego could be the first large city to accomplish all of this.

Respectfully,

Elaine Maltz

Howard Maltz, M.D.

6575 Manana Place  
La Jolla, CA 92037

Response to Comment I-1

The Draft EIR analyzes the environmental effects of implementation of the CAP.

**Comment Letter J**

Peninsula Community Planning Board  
 P O Box 7994  
 San Diego, CA 92167  
[pcpbem@gmail.com](mailto:pcpbem@gmail.com)

September 17, 2015

Ms. Rebecca Malone, Associate Planner  
 City of San Diego Planning Department  
 1222 First Avenue, MS 501  
 San Diego, CA 92101  
 Via email to: [DSDEAS@sanidiego.gov](mailto:DSDEAS@sanidiego.gov)

Draft Program Environmental Impact Report for San Diego Climate Action Plan SCH NO. 2015021053  
 Project NO. 416603, COMMUNITY AREA PLAN: All Community Plan Areas COUNCIL DISTRICT: All Council Districts

The Peninsula Community Planning Board (PCPB) reviewed the Draft Program Environmental Impact Report (PEIR), dated July 2015, for City Council approval for the adoption of the Climate Action Plan (CAP) and associated policies, and appreciates the opportunity to provide comments.

**COMMENTS**

1. According to the Draft PEIR, the CAP was developed in response to State legislation and policies aimed at reducing California's greenhouse gas (GHG) emissions. Former Governor Arnold Schwarzenegger's Executive Order S-3-05 established the 2050 statewide greenhouse gas (GHG) reduction target of 80 percent below 1990 levels. In 2015, Governor Edmund G. Brown, Jr.'s Executive Order B-30-15 established the 2030 statewide GHG reduction target of 40 percent below 1990 levels. The CAP is intended to ensure the City of San Diego contributes its fair share of GHG reductions through local action, and identifies measures to meet GHG reduction targets for 2020 and 2035, and identifies five primary strategies implemented by 17 actions and 32 supporting measures, which together, are intended to meet GHG reduction targets for 2020, as well as an interim target set for 2035. The CAP serves as a framework for City GHG reduction strategies, and includes requirements for monitoring and periodic updates to ensure the City is achieving its GHG reductions targets.

The CAP estimates the GHG emissions for the City of San Diego in the baseline year 2010 (baseline) to be around 13.0 million metric tons of carbon dioxide equivalent (MMT CO<sub>2</sub>e). The CAP estimates the City's emissions would increase to approximately 14.1 MMT CO<sub>2</sub>e by 2020, 15.7 MMT CO<sub>2</sub>e by 2030, and 16.4 MMT CO<sub>2</sub>e by 2035. With implementation of the CAP, the City aims to reduce emissions 15 percent below the baseline to approximately 11.1 MMT CO<sub>2</sub>e by 2020, 40 percent below the baseline to approximately 7.8 MMT CO<sub>2</sub>e by 2030, and 50 percent below the baseline to approximately 6.5 MMT CO<sub>2</sub>e by 2035. The Draft PEIR states that with implementation of the CAP, it is anticipated the City would exceed its reduction target by 1.3 MMT CO<sub>2</sub>e in 2020, 176,528 metric tons (MT) CO<sub>2</sub>e in 2030, and 127,135 MT CO<sub>2</sub>e in 2035.

*It is unclear from the analysis in the Draft PEIR whether the above reduction targets would meet the reduction targets based on 1990 levels, which is the mandate in the above noted Executive Orders.*

J-1

**Response to Comment J-1**

The City of San Diego, when determining its GHG emission reductions from the CAP actions for 2020 and 2035, used a 2010 baseline as recommended by the California Air Resources Board. To make the long range projected emission reductions consistent and easy to understand, the City set its 2020 and 2035 reduction targets on a percentage reduction from that 2010 baseline.

Per the California Air Resources Board (CARB), 1990 statewide emission levels are estimated to be 431 MMTCO<sub>2</sub>e (<http://www.arb.ca.gov/cc/inventory/1990level/1990level.htm>). CARB has also reported 2011 statewide emissions were found to be 429 MMTCO<sub>2</sub>e (<http://www.arb.ca.gov/cc/reporting/ghg-rep/reported-data/2008-2012-ghg-summary-2013-11-04.pdf>), meaning emissions in the baseline year were likely at or near what they were in 1990.

Additionally, although the statewide GHG emissions were approximately the same in 2010 compared to 1990, the City population increased at a slower rate during that same time period (17.15%) than the state as a whole (24.96%) ([https://www.census.gov/prod/2002pubs/00ccdb/cc00\\_tabC1.pdf](https://www.census.gov/prod/2002pubs/00ccdb/cc00_tabC1.pdf); <http://quickfacts.census.gov/qfd/states/06/0666000.html>). Moreover, since 1990, Title 24 requirements for new construction were adopted, use of renewable energy increased, and fuel standards have become more strict. For these reasons, it was determined that the 2010 baseline was an appropriate baseline from which to measure the City's GHG emissions reductions.

Since CARB has not provided guidance on a specific reduction target for local governments to use for 2030 and 2050 and the City cannot acquire data to determine its exact 1990 emission levels, the 2010 baseline provides the most accurate description of the emission reductions that can be achieved by the proposed long-term CAP actions. If CARB provides new guidance on how cities should address the 2030 targets, the City will adjust the CAP accordingly. Page 3 of the Climate Action Plan has been amended to clarify the calculations used to determine the City's emission reduction targets.

**Comment Letter J**

PCPB Comments on Draft PEIR for City of San Diego CAP  
September 17, 2015  
Page 2

2. The Draft PEIR states implementation of the CAP Project would result in significant effects to: Land Use, Visual and Neighborhood Resources, Air Quality, Greenhouse Gases, Historical Resources, and Traffic and Circulation. Table ES-1 (page ES-1) of the Draft PEIR, states all impacts identified can be mitigated to a less-than-significant level, except the impact on Historical Resources. However, Draft PEIR pages ES-4 and ES-5 states after mitigation, the following impacts could remain significant and should be considered an unavoidable consequence of the project:

Issue B.1: Visual Effects and Neighborhood Character: Implementation of the CAP could affect the visual quality of the planning area, particularly with respect to views from public viewing areas, vistas, or open spaces.

Issue B.2: Visual Effects and Neighborhood Character: Implementation of the CAP could introduce incompatible uses with surrounding development in terms of bulk, scale, materials, or style that would result in adverse visual impacts. Executive Summary San Diego Climate Action Plan ES-4 ESA / 140651 Draft Program Environmental Impact Report July 2015

Issue C.2: Air Quality: Implementation of the CAP could result in air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations.

Issue E.1: Historic Resources: Implementation of the CAP could cause a substantial adverse change in the significance of a historical resource, as defined in Section 15064.5, or have other physical or aesthetic effects to a prehistoric or historic building, structure, object or site.

Issue F.2: Transportation and Circulation: Implementation of the CAP could create substantial alterations to present circulation movements including effects on existing public access points and/or resulting from anticipated changes in transportation modes.

*The Draft PEIR needs to clarify whether the above impacts remain significant (i.e., unmitigable) even with the incorporation of mitigation measures identified in the Draft PEIR.*

3. The Draft PEIR states the CAP relies on City and regional actions, continued implementation of federal and state mandates, and five local strategies with associated action steps for target attainment. The five strategy areas are:
- Water & Energy Efficient Buildings;
  - Clean & Renewable Energy;
  - Bicycling, Walking, Transit & Land Use;
  - Zero Waste (Gas & Waste Management); and
  - Climate Resiliency.

J-2

J-3

**Response to Comment J-2**

The conclusions in the Draft EIR analyses in Chapter 3.B (Visual Effects on Neighborhood Character), Chapter 3.C (Air Quality), Chapter 3.E (Historical Resources), and Chapter 3.F (Transportation and Circulation) indicate that significant and unmitigable impacts would remain for these resources even with implementation of mitigation measures. Table E-1 accurately reflects the findings of significance for these resource issues. The text in the first paragraph under Executive Summary, Subsection I (Major Conclusions, Areas of Controversy, and Issues to be Resolved) has been revised to reflect the correct conclusions for these resource issues.

**Response to Comment J-3**

The Draft EIR concluded that implementation of the proposed CAP would result in significant impacts to the following resources issues: Land Use, Visual and Neighborhood Resources, Air Quality, Greenhouse Gases, Historical Resources, and Traffic and Circulation. All applicable mitigation measures identified in the Draft EIR include mitigation measures that are enforceable by the City. The CAP strategies that involve state and regional actions are not mitigation measures required by CEQA. Rather, they are actions that are included in CAP, which is the approval analyzed in the Draft EIR.

**Comment Letter J**

PCPB Comments on Draft PEIR for City of San Diego CAP  
September 17, 2015  
Page 3

Implementation of the CAP is divided into:

- Early Actions (Adoption of the CAP-December 31, 2017),
- Mid-Term Actions (January 1, 2018-December 31, 2020), and
- Longer-Term Actions (2021-2035).

The objectives of the CAP are to:

- Provide a roadmap to achieve GHG reductions;
- Conform to California laws and regulations;
- Implement climate action policies of the General Plan;
- Provide CEQA streamlining for GHG emissions from new developments;
- Create green jobs through incentive-based policies such as manufacture and installation of solar panels;
- Improve public health by removing harmful pollutants from our air and improve water quality;
- Increase local control over the City's future by reducing dependence on imported water and energy;
- Enhance quality of life by supporting active transportation, planting trees and reducing landfill waste;
- Save taxpayer money by decreasing municipal water, waste, and energy usage in City-owned buildings.

*The Draft PEIR appears to rely on mitigation measures which are the responsibility of other agencies (see discussion on Draft PEIR page 2-5). The California Environmental Quality Act (CEQA) Guidelines require mitigation that is legally enforceable by the lead agency preparing and approving the environmental document.*

For example, page 2-5 of the Draft PEIR states: "An important regional action that the CAP relies on is the implementation of Senate Bill 375 (SB 375), which establishes mechanisms for the development of regional targets for reducing passenger vehicle greenhouse gas emissions. SB 375 was adopted by the state on September 30, 2008. In compliance with SB 375, SANDAG adopted the 2050 RTP/SCS on October 28, 2011."

4. As stated in the CAP, the goals for Strategy 3, Bicycling, Walking, Transit and Land Use, are to increase the use of mass transit, increase commuter walking and bicycling opportunities, and promote the effective land use to reduce vehicle miles traveled. Proposed actions to implement this strategy include the following: Action 3.1: Implement the General Plan's Mobility Element and the City of Villages strategy in TPAs to increase the use of transit. The target for Action 3.1 is to achieve mass transit mode share of 12 percent by 2020 and 25 percent by 2035 in TPAs. The City of Villages strategy is the overarching vision for future land use in the City of San Diego. The strategy would encourage the intensification of land uses in TPAs that would allow more residents to rely on transit for their primary commute mode. The strategy does not specifically assign uses to land in the City, but rather would be implemented with the update and adoption of each community plan.

TPAs, shown in Figure 2-1 of Draft PEIR, are based on the adopted SANDAG 2050 Regional Transportation Plan (RTP), which is currently being updated as a part of the San Diego Forward Regional Plan. The Transit Priorities Area map will be updated to reflect the updated RTP following adoption by the SANDAG Board,

J-3

J-4

**Response to Comment J-4**

The CAP used the most current information available at the issuance of the Notice of Preparation to calculate the GHG emission reductions from walking, biking, and transit. When SANDAG amends its Regional Transportation Plan, the City will amend the calculations to reflect the most current data. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Comment Letter J**

PCPB Comments on Draft PEIR for City of San Diego CAP  
September 17, 2015  
Page 4

which is anticipated to occur in the fall of 2015. SB 743 established Section 21099 of the California Public Resources Code (CPRC), which states: "Transit priority area" means "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."

*The PCPB supports increasing use of mass transit, increase commuter walking and bicycling opportunities, and promote the effective land use to reduce vehicle miles traveled. However, reliance on TPAs that are being updated is a concern PCPB because the analysis of how this measure will result in reductions in GHG is speculative and therefore the analysis in the Draft PEIR is not adequate.*

- 5. The Draft PEIR states on page 3.A-20, implementation of the CAP would generally be consistent with all applicable land use plans, policies, and regulations of agencies with jurisdiction over the Project, and would not conflict with any land use plans. Some projects undertaken pursuant to the CAP or in support of CAP programs, particularly the development of large-scale renewable energy facilities within the City limits could conflict with existing land use and zoning designations or could conflict with adjacent land uses. This could result in a significant land use impact.

*The Draft PEIR fails to identify potential locations for development of large-scale renewable energy facilities within the City limits, and in particular the Peninsula community, and that this issue has not been adequately addressed in the Draft PEIR.*

- 6. While the intent of the PEIR was to identify potential impacts that would result from implementation of the CAP, the analysis is not detailed to the level of site specificity. The CAP includes actions to be implemented in the near term (from adoption of the CAP through December 31, 2017) and mid-term (from January 1, 2018 – December 31, 2020).

*The Draft PEIR fails to adequately address the environmental effects of those actions that have been identified in the short term and mid term.*

The PCPB appreciates the opportunity to provide comments on the Draft PEIR for this project and looks forward to receiving the Draft Final PEIR for review. Please direct any questions on these comments to me at: [pcpbem@gmail.com](mailto:pcpbem@gmail.com).

Sincerely,



JULIA M. QUINN, Chair  
Peninsula Community Planning Board

*Approved by an Action of the Peninsula Community Planning Board on September 17, 2015.*

J-4  
J-5  
J-6

**Response to Comment J-5**

The CAP is intended to more fully address projected communitywide greenhouse gas (GHG) emissions and provide a plan for reducing such emissions. As a Program EIR, the Draft EIR was prepared to consider broad programmatic issues at an early stage of the program planning. The Draft EIR analysis provides for the consideration of broad policy alternatives and development of program-wide mitigation measures at an early stage. See CEQA Guidelines §15168(b)(4).

As identified in the Draft EIR, Chapter 3A, Land Use, the specific location for siting of future large-scale renewable energy facilities is not known at this time. However, as discussed in the Draft EIR, future land use changes and any large-scale renewable energy projects proposed to implement the CAP would undergo further CEQA analysis to identify project-specific impacts, to identify feasible mitigation measures, and to consider alternatives, and to provide for public review and comment, prior to approval of any plan or project. Through the CEQA process, the compatibility of surrounding land uses and applicability of all land use plans would be reviewed to determine land use impacts that would result from a particular project, once sufficient detail is available to provide for meaningful environmental review. Additionally, the Draft EIR includes Mitigation Measure LU-1, which addresses the siting of large-scale renewable energy projects.

**Response to Comment J-6**

As discussed above in Response to Comment J-5, the Program Draft EIR is a first-tier programmatic environmental document and detailed site-specific information such as siting of future large-scale renewable energy facilities is not currently known. However, the Draft EIR provides a program level of analysis of the CAP strategies, actions, and supporting measures to be implemented at each phase of the project (Phase 1: Early Actions; Phase 2: Mid-Term Actions and Phase 3: Longer-Term Actions).



9325 Sky Park Court  
Suite 100  
San Diego, CA 92123

**Comment Letter K**

main: 858.244.1177  
fax: 858.244.1178  
www.energycenter.org

September 22, 2015

Delivered to [CAP@SANDIEGO.GOV](mailto:CAP@SANDIEGO.GOV) and [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov)

**The Mayor's Office**

The Honorable Kevin Faulconer, Mayor of San Diego  
Mike Hansen, Policy Advisor for Land Use and Environment

**The Committee on the Environment of the City Council of the City of San Diego**

Councilmember David Alvarez, Chair  
Councilmember Chris Cate, Vice Chair  
Councilmember Todd Gloria  
Councilmember Marti Emerald

**Climate Action Plan City Staff Leads**

Rebecca Malone, Associate Planner  
Brian Schoenfish, Senior City Planner  
Nancy Bragado, Deputy Director, Long-Range Planning  
David Weil, Deputy Director, Energy, Sustainability & Environmental Protection  
Cody Hooven, Sustainability Manager

Dear Mayor Faulconer, Environment Committee Members, and CAP City Staff Leads,

The Center for Sustainable Energy® (CSE; [www.energycenter.org](http://www.energycenter.org)) appreciates the opportunity to submit comments in response to the July 2015 Draft Program Environmental Impact Report (PEIR) of the City of San Diego Climate Action Plan (CAP). CSE commends Mayor Faulconer and City staff for the forward-thinking climate planning strategies the document outlines, as well as the overall vision the plan lays out for a resilient, vibrant, and clean city of San Diego.

K-1

On July 7, 2015 CSE submitted initial comments on the Climate Action Plan addressing the need for strong energy efficiency goals, emphasizing the role of local economic development in reaching 100% clean energy, and offering suggestions for multi-modal transit goals. The issues addressed in these comments continue to be relevant to the CAP and are attached to this letter for your consideration.

K-2

As the City prepares to finalize the CAP, CSE emphasizes the importance of energy benchmarking and transparency for commercial and multifamily buildings, particularly given the recent adoption of the California Energy Commission's Existing Buildings Energy Efficiency Action Plan (AB 758 Action Plan) and passage of Assembly Bill 802 and onto the Governor's desk to be signed. Along with the importance of incorporating commercial and multifamily buildings back into the plan, it is important to continue the strong, local momentum to promote and bolster local economic development and job growth.

K-3



**Response to Comment K-1**

Comment noted.

**Response to Comment K-2**

Comment noted. The attached letter comments on and provides recommendations for the CAP. The letter does not address the adequacy of the Draft EIR. The attachment letter can be found in Appendix 8.

**Response to Comment K-3**

This comment does not address the adequacy of the Draft EIR. Comment noted. Additionally, the CAP accounts for commercial building energy efficiency and disclosure under Federal and State Actions (see CAP Appendix pages A-47 to A-48). While not included in the CAP, any additional requirements that are implemented in the future with respect to such actions would contribute to an even greater amount of anticipated GHG reductions. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Comment Letter K

CSE commends the inclusion of energy efficiency disclosure and reporting in the residential sector; we would also like to see it in commercial and multifamily buildings.

Commercial and multifamily energy efficiency offers the greatest opportunity for cost-effective carbon reductions. A benchmarking and transparency ordinance is the first step to understand energy-savings opportunities and encourage energy retrofits and behavioral changes of building occupants. Currently, the buildings sector is the single largest polluter of carbon emissions in the United States as a whole, and the second largest in the San Diego region, after transportation.

The California Energy Commission passed the *Existing Buildings Energy Efficiency Action Plan* on September 9, 2015, providing a roadmap for doubling energy efficiency in buildings. The Action Plan calls for a statewide benchmarking and transparency program for commercial and multifamily buildings starting in 2017<sup>1</sup> and cites grant opportunities for cities that adopt nonresidential (commercial and multifamily) benchmarking programs in advance of the Energy Commission’s requirements.<sup>2</sup> This is an exciting opportunity for the City of San Diego to take the lead on energy efficiency and secure resources to prepare local stakeholders for energy tracking in EPA’s Portfolio Manager tool in advance of a statewide requirement.

Remaining silent on energy efficiency in commercial and multifamily buildings will result in San Diego falling behind other major cities in California and across the country that have already implemented comprehensive building energy efficiency measures and are on the direct path of realizing cost-effective energy savings.

In regard to Strategy 1 of the PEIR pertaining to energy and water efficient buildings, the energy savings potential and benefits for the commercial buildings sector are significant. Table 2-4, “Growth Assumptions used in the City of San Diego Climate Action Plan”, of the PEIR highlights the data included in the CAP and quantifies the predicted growth in the city in a table. Given the expected growth of the Commercial Building Area which is expected to grow to 398 million square feet by 2035, it is imperative San Diego invest in green buildings and building emissions reduction efforts immediately, including short-term high priority actions.

Benchmarking and reporting the energy and water consumption of buildings is a national best practice; these strategies in the commercial buildings sector directly translate to building performance improvements and reductions in GHG emissions. It is an investment that pays dividends in the long term – both financially and environmentally. Brokers, consumers, local residents, building owners and managers, and tenants all stand to reap the subsequent benefits of implementing building efficiency measures.

K-3

<sup>1</sup> Existing Buildings Energy Efficiency Action Plan, California Energy Commission, p. 45

<sup>2</sup> *Ibid.* p. 56

Comment Letter K

The City of San Diego has the potential to meet the 100% renewable energy goal by 2035. We encourage focusing on local economic benefits to strengthen San Diego's clean energy sector.

In addition to the inclusion of a commercial and multifamily benchmarking and transparency ordinance in the final Climate Action Plan, CSE recommends the efforts to achieve renewable goals to be local in nature and benefit local renewable energy businesses, create jobs, and increase resiliency and investments in the city.

Through the actions outlined in this plan, we see tremendous potential to continue to grow the local clean energy sector thereby creating jobs, attracting investors, and enhancing San Diego's role as a national leader in sustainable energy technology.

San Diego has the potential to capitalize on the strong clean energy presence already in the region. It is up to us as a prominent city to continue to build upon our strengths to attract growth, create jobs, and maximize the potential of clean energy technologies and programs.

Additional priorities CSE would like to see included in the CAP include increased bicycling, walking, transit, and land use policies; zero emission vehicle adoption in the municipal fleet; electric vehicle fueling expansion; and overall policies to reduce vehicle miles traveled.

As San Diego engages in the planning and implementation of the CAP, we provide these comments to encourage the City to demonstrate commitment to energy efficiency in all buildings, create strong opportunities for local businesses, and to offer residents and businesses alike the awareness of opportunities to save money on electricity to expedite overall transition toward clean energy technologies and markets.

Kind Regards,

Jack Clark  
Director of Programs  
Center for Sustainable Energy  
Board Member, San Diego Energy Advisory Board  
Member, SANDAG Energy Working Group

Hanna Grene, LEED AP  
Policy Manager, Energy Efficiency and Building Performance  
Center for Sustainable Energy

K-4  
K-5

Response to Comment K-4

This comment does not address the adequacy of the Draft EIR. Comment noted.

Response to Comment K-5

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter L

**Community Energy Action Network**  
*a San Diego-based cooperation promoting local clean energy*

September 24, 2015

Rebecca Malone, Associate Planner  
City of San Diego Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

By USPS and EMAIL: DSDEAS@sandiego.gov

**SUBJECT: Comments on the Draft Program Environmental Impact Report**  
**PROJECT NAME:** San Diego Climate Action Plan  
**SCH NO.:** 2015021053

Dear Ms. Malone:

I am submitting these comments on the Draft Program Environmental Impact Report for the San Diego Climate Action Plan (CAP) on behalf of the Community Energy Action Network, a San Diego-based cooperation promoting local clean energy.

My comments are related to the adequacy and accuracy of the PEIR with respect to the following Project Objectives:

- Create green jobs through incentive-based policies, such as the manufacture and installation of solar panels;
- Increase local control over the City's future by reducing dependence on imported water and energy;
- Save taxpayer money by decreasing municipal water, waste, and energy usage in City-owned buildings.

The PEIR and CAP should include recommendations that the City Sustainable Energy Advisory Board have made over the past two years to the Mayor and City Council in the areas of Solar Energy system permitting, CCA feasibility/validation studies, Net Energy Metering and residential electric rate restructuring in pertinent sections as appropriate. These documents are available through the City's Energy and Sustainability Division of the Environmental Services Department.

1. CCA: Strategy #2 "Clean and Renewable Energy, Action 2.1 is listed as a "Phase 2" item. "Present to City Council for consideration a Community Choice Aggregation (CCA) or another program that increases the renewable energy supply on the electrical grid.\*"

Action Item 2.1 regarding presenting a proposal for a Community Choice Aggregation energy district or an alternative needs to be a higher priority and phased in earlier. If the phasing noted corresponds to the implementation periods cited, it is not unreasonable and, in fact, highly desirable to *present* (emphasis added) a CCA or another program to the City Council" within the next two years (ie, a Phase 1 activity to be completed by December 31, 2017).

L-1

L-2

L-3

**Response to Comment L-1**

Comment noted.

**Response to Comment L-2**

Comment noted.

**Response to Comment L-3**

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment noted.

**Comment Letter L**

**Comments on the Draft Program Environmental Impact Report**  
 San Diego Climate Action Plan  
 September 24, 2015  
 Page 2 of 4

City staff and the City Sustainable Energy Advisory (SEA) Board are in the process of reviewing components of City-funded validation study on the results of an independently-funded CCA draft feasibility study. SEA Board has communicated factors to be included in the study and establishment of a CCA by letter to the Mayor and City Council that should be incorporated in the Draft PEIR.

A Phase 1 designation for the evaluation and presentation of the CCA or other program to the City Council is critical to meet the project objective to increase local control and reduce dependence on imported energy and achieve the target to add additional renewable electricity supply to achieve 100 percent renewable electricity by 2035 city-wide. It is also critical to consider options for the City municipal facilities including more efficient operation of public infrastructure such as lighting that will not subject the City to rate increases for operation of those investments.

Table 3.1 Local, Regional and Federal Actions assigns 2,603,944 MT CO<sub>2</sub>e to Action item 2.1. This is nearly three-quarters of the Total Reductions from Local Actions of 3,531,399 MT CO<sub>2</sub>e. Every year of delaying the implementation of an enforceable, effective program to promote renewable energy within the City of San Diego adds significantly to later year requirements.

2. "Energy Resources" description at page 1-11 in the Introduction and Environmental Setting is deficient and includes inaccuracies. SDG&E recently published a "Power Content Label", circulated in the bills of all customers that sets forth the SDG&E 2014 Power Mix. This information should be included in this section.

The description of energy resources should acknowledge the generation of electricity, largely photovoltaic electricity independently produced by residents, businesses and institutions. The current baseline of renewable distributed energy should be provided as a benchmark. An estimate of the potential capacity of roof top and covered parking lot photovoltaic installations for the City should be included – even if it is expressed as an approximate prorated portion of the estimated 7,000 Megawatt potential in the entire SDG&E service territory.

The role and expectation of the agency or entity that will use the public right of way for distribution of energy sources in making the transition to 100% renewables with an emphasis on locally generated renewable energy, employment of storage technologies and demand management strategies needs to be defined in the CAP and made a part of the conditions for the City franchise agreement for operation of distribution lines within the public right of way.

Alternatives to the formation of a CCA should include the potential for municipal public utility options and aggregation and consortium of micro energy districts in accord with City Charter provisions.



**Response to Comment L-4**

The information regarding SDGE has been corrected in the FEIR. In the baseline year (2010), the amount of energy in the SDGE mix from solar was 0.0 percent. This is why it is not listed as an energy source.

**Response to Comment L-5**

Comment noted. The CAP is a planning-level document. Details related to actions identified within the CAP will be explored during implementation of the CAP.

**Comment Letter L**

**Comments on the Draft Program Environmental Impact Report**  
 San Diego Climate Action Plan  
 September 24, 2015  
 Page 3 of 4

3. Economic Development. California Solar Energy Industry Association cited in statewide study, "California Solar Jobs Census 2014" released on February 12, 2015 that there are 54,690 workers at 3,813 establishments throughout the State of California.

The PEIR should include current jobs in the solar industry and within the energy efficiency industries within the City and/or region as a baseline and identify the need for a stable Net Energy Metering program to ensure sustainable growth of the solar industry job and business sector. The SEA Board recommendation and resolution forwarded in a recent letter to the Mayor and City Council regarding economic development implications of the Net Energy Metering program should be incorporated as a part of the PEIR.

L-6

4. Community Development and Equity. The baseline and potential quantified targets for achievement of project objectives and plan targets in each of the plan actions should be prepared for each community planning area and eventually tracked by census tract.

The CAP PEIR should address the methods and incentives contemplated by the actions proposed to ensure equity in the allocation of resources so that "communities of concern" are able to participate and realize the benefits of energy efficiency and renewable energy installations as well as the jobs created in making those installations.

L-7

This strategy should be integrated with the City's Consolidated Plan for expenditure and leveraging of Federal CDBG and HOME funds as well as funds made available through distribution of cap and trade funds and redevelopment loans which the state has authorized for reimbursement to the City.

5. Inter-relationship of CAP Actions.

A number of the CAP strategies and actions in areas not categorized as energy will have impact on energy use. As examples, achieving the objective of reducing dependence on imported water may reduce costs of pumping and transporting water, but increase energy use for treatment of waste water.

L-8

How any new energy needs are created in an area such as water reclamation should be clearly addressed along with the actions to achieve water and energy savings in municipal facilities. As in energy conservation, the best strategy for cost saving in water is efficiency first.

In the treatment of waste and generation of methane, the potential for capture and potential use of methane for energy generation should clearly indicate the cost benefit and net impact on GHGs.

L-9

**Response to Comment L-6**

This comment does not address the adequacy of the Draft EIR. Comment noted. See CAP Chapter 4 regarding job creation.

**Response to Comment L-7**

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting. Please see CAP Chapter 4 regarding social equity.

**Response to Comment L-8**

CAP Appendix A describes the methodology used to determine GHG emissions reductions from CAP Actions. The section on Common Assumptions and Sources in CAP Appendix A includes a discussion of the relationship between the GHG emissions rate and CAP measures. This section outlines the ways in which the CAP measures are interrelated and what was done to account for this in calculating the GHG emissions reductions from the CAP. As for the example in the comment, the CAP does not include recycled water as an action item, so any reductions or increases in GHG emissions from less reliance on imported water were not included in the GHG reduction calculations. A description of the City's Pure Water Program was included in CAP Chapter 5, Adaptation.

**Response to Comment L-9**

Please see Response to Comment L-8.

Comment Letter L

Comments on the Draft Program Environmental Impact Report  
San Diego Climate Action Plan  
September 24, 2015  
Page 4 of 4

An area that the CAP does not evaluate is telecommuting, also referred to as “telework”. While the City may not mandate this practice for other employers, it can evaluate for the City workforce and as appropriate with contractors. The City could incentivize this practice and support a demonstration program to evaluate the potential to reduce GHG generation and other impacts of commuting such as land use for additional lanes and parking spaces for rush hour commutes.

L-10

Appropriate installation of the urban forestry measures proposed as adaptation measures needs to include not interfering with potential for roof top and parking lot solar energy installation. Installation guidelines need to be coordinated to achieve the maximum benefits of each measure – shade, carbon absorption, electric generation. PV installations by creating shade can significantly reduced heating loads on buildings and parking areas as well as contribute to the charging infrastructure for expansion of electric powered vehicles.

L-11

6. Advantages of local, small scale distributed generation of renewable energy. The Executive Summary section, Table ES-1 identifies a potential significant impact in “A. Land Use” from installation of large-scale renewable energy projects. The mitigations proposed include siting guidelines. For (H) Water supply, Table ES-1 recommends a Water Supply Assessment to ensure that large scale renewable energy projects do not use excessive amounts of water.

L-12

The PEIR should note that the emphasis for renewable energy generation should be on technologies that use little or no water and are smaller scale, distributed systems and/or technologies such as photovoltaic panels located on rooftops, parking lots and other developed structures as the preferred, highest priority strategy to achieve renewable energy goals. This will help avoid the impacts of siting facilities on undeveloped land that may create significant visual and other adverse impacts, including adversely affecting the goal of generating local food sources and providing parks and open space areas.

Thank you for your consideration. Please contact me at (619) 813-8485 or email [hcjpowell@cox.net](mailto:hcjpowell@cox.net) if you have any questions and please include me on future noticing of proposed changes and public hearings on the CAP PEIR.

- 5 -

HC Jay Powell  
3191 North Mountain View Drive  
San Diego, CA 92116  
[hcjpowell@cox.net](mailto:hcjpowell@cox.net)  
(619) 813-8485

File: SOLARSD/CAP PEIR CEAN comments 092415

Response to Comment L-10

This comment does not address the adequacy of the Draft EIR. Comment noted.

Response to Comment L-11

The CAP includes actions and strategies that address both the Urban Tree Planting Program and Clean and Renewable Energy. Upon adoption of the proposed CAP program, the City will establish policies, programs and ordinances that facilitate and promote the Urban Tree Planting Program and the siting of new onsite photovoltaic energy generation and energy storage systems. As part of the annual monitoring program, City staff will annually evaluate city policies, plans and codes as needed to ensure the CAP reduction targets are met.

Response to Comment L-12

The Draft EIR addresses the potential impacts that may occur with implementation of the proposed CAP strategies and actions. The CAP does not propose to construct any site-specific renewable energy infrastructure projects; rather, Action 2.1 directs the City to consider adoption of a community choice aggregation program, or other program, to leverage its purchasing power for renewable sources of energy. This would include encouraging and facilitating the installation of distributed (small-scale) renewable energy systems for homes and businesses. It may also result in the need for large-scale generation, transmission, and storage systems to maintain a consistent energy supply. The potential impacts associated with the construction of large-scale renewable energy facilities are discussed in DEIR Chapter 3.

Comment Letter M

**From:** Donna Shanske  
**To:** DSD EAS  
**Subject:** Comments regarding SD Climate Action Plan, SCH NO: 2015021053  
**Date:** Sunday, September 27, 2015 4:56:40 PM

Attention: Rebecca Malone

I have briefly reviewed the City's Climate Action Plan to reduce green house gases in San Diego. It is a great effort with many positive ideas expressed. I only have the following realistic concerns about the plan's implementation:

- Tree-Planting program using recycled or grey water. With this program, we are still dependent on most of our water from outside sources. If the drought continues [after El Nino], these sources will dry up, and we could become dependent on de-salinization plants along the coast that are not even "on the radar." More trees could absorb some of the air pollution from the ever-increasing number of cars on the streets of San Diego + the air pollution from Interstate 5 and the airport that earns San Diego an "F" for ozone and fine particulate matter in the coastal zones by the Lung Association.
- SANDAG's Bike-Ride-Walk program: San Diego's County/City Development Plan mimics that of Los Angeles, i.e., development of large suburban areas that are dependent on the freeway system (cars) to get to everywhere outside of their neighborhoods. Even in the Uptown Neighborhoods, most residents do not work Downtown; to be able to afford our rents/mortgages, we must have good-paying jobs in Poway (military contractors), UTC (banks, RE, investments), Sorrento Valley (biotech) or Carmel Heights (business/pharma/biotech) companies. The SD Planning Department has only attracted Sempra Energy (1968) to headquarter downtown. Also federal, state, city jobs, the courts, etc. are downtown, but most of these jobs do not pay enough to be able to afford the rents/condos in our Uptown neighborhoods...hence, no one in my neighborhood takes the bus or walks/bikes to work, (Residents get on the 5/805 to head North each morning.) We have had a bike lane on 5<sup>th</sup> Ave. since May, 2014, (Elm up to Hillcrest) with rarely a bicycle using it...seems dangerous really, as 700 more hi-rise units have been approved for our neighborhood in the next 1.5 year with approx. 1500 more cars without infrastructure improvements + increasing air pollution.
- Seems a rational approach with the Bike-Ride-Walk would be to identify where people live and how they get to work ---then create an approach for them to get to work without their cars. MTS also needs to become more rider-friendly. The Dash in L.A. charges 50-cents/25-cents for Seniors and is PACKED with riders. Monthly S.D. MTS passes are \$72.00 = more than one day's wages for so many making \$9.00/hour in San Diego. (Note: The 40,000 jobs created in San Diego last year were mostly those paying poverty wages - retail and service-oriented.) Over the summer, seniors were required to either show their I.D. every time they rode the bus OR go downtown and stand in the long line to get a new picture I.D. How about having one day a week FREE to everyone on the MTS + reduced fares!!

M-1

M-2

As mentioned, the Climate Action Plan is a good start; its implementation will be the challenge.

Good luck – to all of us!

Thank you.

Donna Shanske

Bankers Hill

**Response to Comment M-1**

Comment noted. Implementation of Action 5.1 would increase the urban tree canopy coverage. The program includes water conservation measures to minimize water use for tree plantings, use of drought-tolerant plantings and native trees, and prioritizing planting in areas with recycled water and grey water infrastructure. Although the increase in urban tree canopy would result in additional use of water, the program would be developed to conform to current and future water use restrictions. The use of recycled water and drought tolerant and native planting and tree species would also reduce the demand for water.

**Response to Comment M-2**

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter N

Bill Tippetts  
5850 Soledad Mountain Road  
La Jolla, CA 92037

September 28, 2015

Rebecca Malone, Associate Planner  
City of San Diego Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

Submitted Via Email to: DSDEAS@sanidiego.gov

Subject: Comments on the City of San Diego 2015 Climate Action Plan (CAP) and Draft Programmatic Environmental Impact Report (PEIR); Project Number IO No:21002571/11003392

Dear Ms. Malone:

These comments on and recommendations for the CAP and PEIR are submitted in response to the City of San Diego's July 31, 2015 Public Notice of PEIR (comments period closes September 29, 2015). The CAP presents a reasonable overall strategy and many measures to reduce greenhouse gas (GHG) emissions that, if augmented/modified along the lines in the comments and recommendations herein (and those of other environmentally-oriented commenters), would also serve as an important model for other local jurisdictions. The PEIR provides a reasonable assessment of potential impacts that could result from implementing the CAP and identifies mitigation measures to address most of those impacts. However, as identified in these comments and recommendations, there are a number of uncertainties and questions regarding the adequacy of those measures, clearer assurances are needed that the identified CAPs measures can/will be implemented, and important additional measures should be included - in an amended CAP/PEIR (proposed project/EIR). Additional or modified PEIR mitigation measures are needed that establish relevant thresholds of significance (particularly for GHG emissions). This letter provides recommendations to improve the CAP (the proposed project) and the PEIRs mitigation and implementation.

The San Diego region and the City of San Diego have made significant commitments and fiscal investments to conserve important habitats and species, preserve and enhance bay and coastal resources, and provide for improved quality of life for its citizenry. Although the City's efforts through its CAP can only partly address (i.e., reduce) the drivers of climate change – especially GHG emissions – it can also serve as an example for other urban centers to aggressively confront and reduce their GHG emissions while maintaining/improving their quality of life.

As stated in the PEIR's public notice (page 2): "The CAP relies on significant City and regional actions, continued implementation of federal and state mandates, and five local strategies with associated action steps for target attainment. The five strategy areas are: Water & Energy Efficient Buildings; Clean & Renewable Energy; Bicycling, Walking, Transit & Land Use; Zero Waste (Gas & Waste). Implementation of the CAP is divided into: Early Actions (Adoption of the CAP-December 31, 2017), Mid-Term Actions (January 1, 2018-December 31, 2020), and Longer-Term Actions (2021-2035). Through

N-1

N-2

N-3

Response to Comment N-1

Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting. The City is working on refining and formulating appropriate GHG significance thresholds, and anticipates bringing such thresholds for City Council consideration in 2016.

Response to Comment N-2

Comment noted.

Response to Comment N-3

As part of the CAP implementation strategy, the City intends to monitor the effectiveness of CAP actions at reducing GHG emissions. This will enable the City to make adjustments to the CAP, including implementing new, more aggressive strategies to achieve the City's GHG reduction targets beyond 2020, if needed. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting. As stated on page 29 of the CAP, the City "recognizes that given the long planning horizon of the CAP, it may become necessary to modify the specific actions as circumstances change over time. While the City is committed to meeting the 2020 and 2035 GHG reduction targets, the City recognizes that there are multiple ways to achieve that goal and that flexibility in implementation is necessary to allow the City to evolve its strategies to achieve the most effective path to the desired result. Specifically, for identified local ordinance, policy or program actions to achieve 2020 and 2035 GHG reduction targets, the City may substitute equivalent GHG reductions through other local ordinance, policy or program actions." Achieving the specified 2020 and 2035 targets would be ensured through implementation for the monitoring and reporting measures set forth in CAP Chapter 3. With respect to the CAP as a qualified GHG reduction plan under CEQA, since the Draft EIR was published, the City has decided to refine and formulate its approach to utilizing the CAP as a qualified GHG reduction plan. Accordingly, the CAP has been changed to provide for the future implementation of the CAP as a qualified GHG reduction plan to address both the 2020 and 2035 targets. It is anticipated that future implementing actions will be brought to the City Council for consideration in 2016.

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2020, the CAP meets the requirements set forth in CEQA Guidelines Section 15183.5, whereby a lead agency (e.g. the City of San Diego) may analyze and mitigate the significant effects of GHG emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce GHG emissions. Following adoption of the CAP, eligible individual projects preparing project-specific environmental documents may tier from and/or incorporate by reference the CAP's programmatic review of GHG impacts in their cumulative impacts analysis by using the CAP Compliance Checklist (Appendix A of the CAP) and the 'GHG Emissions Screening Criteria'."

The CAP proposes a reasonable approach to reducing GHG emissions, particularly up to 2020. After that, the CAP would not be as effective in terms of meeting the City's "fair share" of the state's GHG emission reduction targets and a number of improvements to the CAP should be made before it is approved and the PEIR is certified.

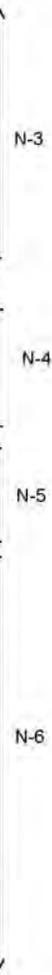
**Comments/Recommendations:**

The following comments and recommendations focus on biological/environmental (including GHG emission) concerns. Issues regarding visual and neighborhood character (including social justice) and historical resources, which are equally important, are not commented to the same extent because the commentator is less familiar with specific issues related to those topics, not necessarily because they are fully addressed by the PEIR.

The PEIR must clarify how actions and projects after 2020 will be processed – for example, does the City propose that projects to be implemented post-2020 also can use this document for tiering purposes, if they are consistent with the CAP and PEIR (which will likely be amended in future years to reflect changing scientific information, technological advances, etc.)?

Page ES-2 cites Executive Order S-3-05 (state's GHG emission reduction target of 80% below 1990 statewide GHG emission levels by 2050); EO B-30-15 (interim target of 40% below 1990 statewide GHG emission levels by 2030); and AB 32, setting an initial target to reduce GHG emissions to 1990 levels by 2020 and requiring CARB to prepare a scoping plan with a pathway for local governments to contribute their fair share toward meeting the statewide 2020 target. The City's proposed CAP is expected to meet the 2020 target (the City's "fair share") and extends to/establishes an interim (2035) "fair share" GHG emissions reduction target between the state's 2030 requirement and 2050 target.

The recently updated (2013) GHG inventory for SD County documented that the county's 2010 GHG emissions were approximately 9% higher than its 1990 GHG emissions (<http://catcher.sandiego.edu/items/usdlaw/EPIC-GHG-2013.pdf>) or about 29 MMTCO<sub>2</sub>e for 1990. Assuming that a similar relationship (2010 GHG level is about 9% higher than 1990) existed for the City of San Diego, then the City's 1990 GHG emissions were about 11.8 MMTCO<sub>2</sub>e. Based on the proposed CAP's approach to establish its GHG emission thresholds on its 2010 emissions, then it appears the reductions would be consistent with the state's GHG "fair share" reductions, at least for the 2020 target: the CAP's proposed 15% reduction from 2010 levels by 2020 would result in emissions of 11.1 MMTCO<sub>2</sub>e and the conformance with state's strategy would require City's GHG emissions to be reduced to the 1990 level, or about 11.8 MMTCO<sub>2</sub>e. However, applying the 2010 baseline and subsequent target year percentage reductions, the City would not fully meet the state's GHG reduction requirements. Specifically, a 40% reduction in 2010 levels by 2030 would result in 7.8 MMTCO<sub>2</sub>e vs. 7.1 MMTCO<sub>2</sub>e of



**Response to Comment N-4**

Comment noted.

**Response to Comment N-5**

Please see Response to Comment N-3.

**Response to Comment N-6**

See Response to Comment N-3 regarding updates to the CAP. In Draft EIR Section 3.D Greenhouse Gases, Issue 2 discusses whether the CAP would conflict with the GHG reduction targets and measures identified in Governor's Executive Order S-3-05, Executive Order B-30-15, and CARB's AB 32 Scoping Plan. Please refer to Draft EIR section 3.D for additional analysis. Please also see Response to Comment J-1.

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emissions to fully meet the state-based (1990 baseline) target; a 50% reduction by 2035 would result in 6.5 MMTCO<sub>2</sub>e vs. 5.9 MMTCO<sub>2</sub>e of emissions to fully meet the state (1990 baseline) target; an 80% reduction by 2050 would result in 2.6 MMTCO<sub>2</sub>e vs. 2.4 MMTCO<sub>2</sub>e of emissions to fully meet the state (1990 baseline) target.

However, as documented in the CAP and PEIR documents, the CAP is expected to reduce GHG levels by more than the City's targets ("...it is anticipated that the City would exceed its reduction target by 1.3 MT CO<sub>2</sub>e in 2020, 176,528 metric tons (MT) CO<sub>2</sub>e in 2030, and 127,135 MT CO<sub>2</sub>e in 2035."). This information, combined with the above paragraph, indicates that the CAP would align with – but not fully achieve - the state's goals after 2020. The inclusion of several new measures (recommendations in this letter and other reasonable/viable recommendations from other commenters) would further reduce the GHG emissions and the CAP should be revised so that it fully meets the state-based 1990 baseline GHG emission reduction targets. Additionally, the CAP should have a requirement for regular review and updates (at least every 3-5 years) and the City should commit to adjust its GHG emission reduction targets and implementation actions so that they fully meet the state's or other more rigorous targets, as appropriate.

Page ES-3 lists nine plan objectives including providing the roadmap to GHG reductions, complying with state targets and regulations, implement Gen Plan climate policies, CEQA streamlining for GHG reductions by projects, improve local control over and reduce dependence on imported water and energy use, improve air and water quality/reduce pollutants, create green jobs/energy efficiencies, enhance quality of life through active transportation/tree planting/waste reduction, save taxpayers money. Subsequent comments and recommendations are provided on several of these items that would improve the City's proposed GHG emission reductions in the short and mid-term, bringing it closer to conformance with the state's targets.

Pages ES-3 to 5 identify a number of Significant and Unavoidable Potential Impacts to Historical Resources, Air Quality, Transportation and Circulation network, Visual Effects/Neighborhood Character. The mitigation element proposes that potentially significant effects to the items listed above (except for Historical Resources) as well as to GHG emissions and Land Use, except for Historical Resources, can be mitigated to below levels of significance.

Page ES-4 identifies two Project Alternatives: No Project and the 2012 Climate Mitigation and Adaptation Plan. CEQA requires that a range of reasonable/feasible alternatives be presented for public review. Presenting only two alternatives has the effect to limit the number and range of potentially feasible avoidance, minimization and mitigation measures for review by the public and consideration by the lead/adopting agency (the City/City Council). Given the limited scope of the alternatives, this comment letter requests that the proposed project (CAP) be amended to include additional/modified avoidance, minimization and mitigation measures.

Table ES-1: Issue A.1 (Land Use – large energy facilities siting/operations) focuses on potential impacts from facility siting and operations and the primary mitigation measures are to ensure that any proposed facility (within the City's purview) conform to a proposed project (impact minimizing) checklist, community/neighborhood plans, etc. A checklist is essential to verify whether a project meets the requirements of the CAP and its impacts are below the thresholds/criteria for significant impacts, and to provide information regarding what, if any, modifications would be required to achieve compliance



**Response to Comment N-7**

Comment noted.

**Response to Comment N-8**

Please see Response to Comment J-2.

**Response to Comment N-9**

The commenter is requesting that additional and/or modified avoidance, minimization, and mitigation measures be developed given the limited amount of alternatives evaluated in the Draft EIR. Consistent with CEQA Guidelines section 15126.6, the Draft EIR includes a range of reasonable alternatives that would feasibly attain most of the basic objectives of the project. See Draft EIR Chapter 8 for additional information regarding the selection of the alternatives considered.

In addition to the alternatives analyzed in the Draft EIR, the Draft EIR also included appropriate mitigation measures to reduce land use, air quality, and water supply impacts to a less than significant level.

**Response to Comment N-10**

Comment noted.

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(including ongoing monitoring and reporting). Comments on the checklist and monitoring/reporting aspects are provided later in this letter.

N-10

Issue C- AIR 1 and AIR 2 (Air Quality) – (1) construction projects will adhere to checklists and best available control measures and (2) recycling/organic operations will enact clean(er) practices including offsetting increased VMT effects. The proposed mitigation approach appears reasonable.

N-11

Issue D (GHG) identifies no significant effects related to (1) increasing (cumulative) GHG emissions from project activities or (2) conflicts with state targets/fair share expectations. As noted in previous comments, the proposed CAP intends to use the 2010 GHG baseline and specific percentage emission reductions, but after 2020 those reductions would not fully meet the state’s targeted reductions for 2030 and 2050 – which is a potentially significant effect. Comments and recommendations to modify the proposed CAP (the proposed project) would further reduce GHG emissions and should be included in a revised CAP/proposed project.

N-12

Issue F (Transportation and Circulation) identifies less than significant impacts for general effects to the planned system/network or to adopted plans/policies with a mitigation measures for altering traffic circles-roundabouts and fuel use. A substantial concern regarding the CAPs proposed approach to avoiding/mitigating traffic and circulation effects is that the CAP relies too much on the (draft) SANDAG Regional Plan (RTP/SCS) to facilitate the City’s smart growth and on the City’s “City of Villages” strategy to increase population/housing densities along transit routes. The Regional Plan does little to strengthen the implementation of (the cities’ and County’s) existing transit priority areas and reduce demand for more freeways and major roads – and does not result in a substantial reduction in vehicle miles traveled. The City of Villages strategy, while potentially viable, has no assurances that it will be implemented through the community plans. Given those uncertainties, it appears that the CAP cannot fully rely on the anticipated benefits from the Regional Plan and Community Plans/City of Villages, which calls into question whether there will be significant impacts to traffic and circulation if the CAP is approved and implemented. As shown in Table 2-3, the CAP would not produce any land use/smart growth-derived GHG reductions by 2020 and the contributions in 2030 and 2035 are projected to be 3.5 and 3.1% of the total City reductions. Given the emphasis in the CAP on smart growth as an avoidance/mitigation measure, it appears that the City should specify implementation measures to both ensure that those minimum targets are met, and make serious efforts to increase smart growth planning to increase the contributions by 2030.

N-13

Issue H (Water Supply) identifies a potential impact regarding excessive water use and focuses on enacting mitigation measures to ensure that renewable energy facilities do not to use too much water and sets certain other significance thresholds for the amount of water projects could use. Water transport, treatment and recycling are significant energy demands, and the CAP should provide additional measures to reduce water demand. Recommendations are provided later in this letter to implement additional water reductions as part of the CAP strategies.

N-14

Page 1-3 (Qualified CAP): Per the PEIR, CEQA Section 15183.5(b)(1)(A)-(F) provides that a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. The CAP incorporates project screening criteria and will include a Consistency Checklist for

N-15

**Response to Comment N-11**

Comment noted.

**Response to Comment N-12**

Comment noted. See response to Comment N-6 regarding use of the baseline year 2010. In Section 3.D Greenhouse Gases, Issue 1 considers whether implementation of the CAP itself, would generate GHG emissions, directly or indirectly, that may have a cumulatively significant impact on the environment. Although projects described in the CAP may result in short-term construction-related GHG emissions, “[i]mplementation of the CAP would reduce per capita GHG emissions. Implementation of the CAP would also result in an overall decrease in GHG emissions citywide.”

**Response to Comment N-13**

As stated on Page 42 of the CAP, “the City will annually evaluate city policies, plans, and codes as needed to ensure the CAP reduction targets are met.” This is the City’s primary near-term mechanism of implementing CAP Strategy 3, Action 3.1, and Action 3.6, which would enable smart growth and transit-oriented development in transit priority areas. The City will begin these evaluations and updates as early as 2016. In addition, the General Plan contains multiple policies supporting smart growth and transit oriented development in TPAs (See City of Villages Strategy and policies ME-A.8, ME.B-1, ME-B.2, ME-B.3, and ME-B.9), and because the Community Plans are updated to be consistent with the goals of the General Plan, Community Plans would implement these goals within their land use element. Furthermore, the City will monitor the success of CAP actions so that the City may develop additional implementation measures in the future to support smart growth and transit oriented development and achieve the reductions quantified in the CAP for Strategy 3, Action 3.1, and Action 3.6. Various supporting measures are also provided within CAP Strategy 3 that would help support implementation of Actions 3.1 and 3.6.

**Response to Comment N-14**

Overall analysis of the CAP accounts for water supply in determining overall GHG reductions. Comment noted.

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projects to determine projects qualify (are not cumulatively considerable). Comments on the screening criteria are provided later in this letter.

N-15

Page 2-1 establishes the City's approach for establishing its 2020 GHG reduction target: "...such that statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions). AB 32 anticipates that the GHG reduction goals will be met, in part, through local government actions. The CARB has identified a (clarification added: 2020) GHG reduction target of 15 percent from 2010 levels for local governments (municipal and community-wide) and notes that successful implementation of the plan relies on local governments' land use planning and urban growth decisions as local governments have primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions." As commented on previously, this approach would meet the state's initial (2020) target, and the CAP proposes measures that would exceed the City's "fair share" contribution to the state's target – but implementing the CAPs subsequent targets would not fully meet the state's targets for 2030, 2035 and 2050, based on the 2010 baseline and percentage reductions. The CAP should include additional GHG reduction measures (as provided in this letter), and periodically revise the CAP to incorporate new technologies and actions to further reduce the City's GHG emissions so that they achieve the state's 1990-baseline based targets.

N-16

Page 2-4: The CAP estimates the GHG emissions for the City of San Diego in the baseline year 2010 were approximately 13.0 million metric tons of carbon dioxide equivalent (MMT CO<sub>2</sub>e), of which the largest contributing sector was transportation (54 percent), followed by electricity use (24 percent), natural gas use (16 percent), and solid waste and wastewater collection, disposal, and treatment (5 percent). An essential focus of additional GHG reductions should be in the transportation (and land use/smart growth), building energy and water use sectors.

N-17

Pages 2-4 and 5 describe the GHG 2010 baseline (13.1 MMTCO<sub>2</sub>e); BAU projections for 2020 (14.1 MMTCO<sub>2</sub>e), 2030 (15.7 MMTCO<sub>2</sub>e), 2035 (16.6 MMTCO<sub>2</sub>e); if CAP implemented emissions reduced to 9.8, 7.6, 6.4 MMTCO<sub>2</sub>e, respectively for those years) – CAP reduces GHG emissions by an additional 1.3, 0.18 and 0.13 MMTCO<sub>2</sub>e, respectively, in those years, compared to the City's targets. In 2020, 2030, and 2035, a majority of the GHG reductions are associated with actions taken at the state and regional level (90 percent in 2020, 74 percent in 2030, and 65 percent in 2035). The City's CAP demonstrates its expectation to play an increasingly significant role in reducing overall GHG emissions, which is commendable.

N-18

Page 2-6: Table 2-2 documents that the SANDAG RTP/SCS (and the draft 2015 Regional Plan is little different) would have a decreasing role in (i.e., contributes a reduced percentage to) the city's GHG emissions through 2035. As described in earlier comments, the draft Regional Plan does not provide an appropriate regional framework for the individual cities to increase their "smart growth/transit priority areas" beyond what their extant general plans call for. Unlike the other reductions listed as "state and regional reductions," and as described in PEIR text, the City of San Diego not only participates in SANDAG's planning decisions, but also relies – in part – on an effective regional transportation and smart growth plan for its own transportation and circulation system.

N-19

The City has analyzed the current (2011) RTP/SCS and its contributions to support the General Plan's transportation/smart growth (Transit Priority Areas or TPAs) approaches, which are intended to

**Response to Comment N-15**

Comment noted.

**Response to Comment N-16**

Please see Responses to Comments N-3 and N-6.

**Response to Comment N-17**

Comment noted. The CAP includes strategies and actions to address transportation, building energy, and water use. Strategy 3: Bicycling, Walking, Transit, and Land Use includes six actions that would increase mass transit use, increase commuter walking, increase commuter biking, re-time traffic signals, install roundabouts, and promote effective land use to reduce vehicle miles traveled. Strategy 1: Water and Energy Efficient Buildings includes five actions that would provide for a Residential Energy Conservation and Disclosure Ordinance; a Municipal Energy Strategy and Implementation Plan; a new water rate and billing structure; a Water Conservation and Disclosure Ordinance; and an Outdoor Landscaping Ordinance.

**Response to Comment N-18**

Comment noted.

**Response to Comment N-19**

Comment noted. Please also see Response to Comment N-13.

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contribute to the city's GHG emission reductions. However, as a SANDAG member, the City should encourage the forthcoming RTP/SCS update (the "Regional Plan") to improve its regional GHG emission reductions, particularly to increase the locations and number of smart growth/transit-oriented developments that can further shift mode share from private vehicles to "transit" modes, and further reduce vehicle miles traveled (VMT) within the City and region. As will be addressed later in these comments, land use is a critical avoidance and mitigation measure that can be more effectively utilized by the City. As an example of how the City could improve its approach to TPAs, the Grantville project, which would appear to be designed to integrate smart growth and increased transit utilization, did not prioritize such integration. Although it and similar projects may incorporate some elements of effective TOD/smart growth, the City's land use and transportation policies and practices must be improved to ensure appropriate integration and linking with the regional transportation/circulation network (which should reflect the local governments' needs while providing the regional integration that individual local governments cannot accomplish on their own).

N-19

Page 2-7 et seq. (Strategy 1: Water and Energy Efficient Buildings). Action 1.1 should be revised to have the disclosure ordinance apply to residential and commercial buildings; to be consistent with state guidance/targets, the ordinance should require energy audits at the point-of-sale or change in ownership, energy reductions for existing homes should reduce energy use by 40% by 2020 and reach zero net energy in 50% of commercial buildings by 2035, which will further reduce GHG emissions. The City should establish appropriate energy efficiency ratings/levels for residential and commercial buildings now, which should be adjusted each year so that the 2020 and 2035 target year levels are attained. Lists of acceptable actions and measures to achieve those efficiencies should be prepared by the City, which must also have the means to monitor and enforce compliance.

N-20

Action 1.2 should include energy reductions comparable to commercial buildings (e.g., 50% reduction in energy consumption by 2035 or reach zero net energy in 50% of municipal buildings by 2035).

Also, the City should require all new residential construction to be zero net energy by 2020 and all new commercial construction to be zero net energy by 2030 (consistent with state targets).

The City should consider establishing a "GHG emissions mitigation/credit system" to allow projects that document net negative GHG emissions (that is, it will have less than zero GHG emissions) to "bank" their extra GHG emissions as credits. The system would be similar to wetland and upland mitigation banking, where a project's qualifying "extra GHG emission reductions" could be subsequently traded/sold as GHG credits to other projects in the City (essentially functioning like a cap-and-trade system within the City).

N-21

Actions 1.3, 1.4 and 1.5. The City's Water Task Force prepared a strategy that would significantly water use (reducing use by up to 35% by 2035). The CAP's three proposed actions do not appear to achieve that level of water reductions. Furthermore, other municipalities in southern California have greatly reduced their water consumption (e.g., Santa Barbara's daily average consumption is about 66 gallons/person/day, Goleta's is about 55 gpd). Melbourne, Australia (population of 4.3 million) was able to reduce its average daily consumption per person by 50% using feasible, mostly low-technology solutions. Because water transport, treatment and recycling are substantial energy demands, the City – and this CAP - must do more to reduce its water (and associated energy) demand, which would further reduce GHG emissions.

Response to Comment N-20

This comment does not address the adequacy of the Draft EIR. Comment noted. Regarding commercial building benchmarking, please see Response to Comment K-3.

Response to Comment N-21

This comment does not address the adequacy of the Draft EIR. Comment noted.

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The City should develop a water demand/use reduction program that follows the City's Water Task Force recommendation to reduce water use by 35% (or more as other southern California and arid municipalities have done), a water use tracking system, establish specific targets for 2020 and 2035 (based on lot size, building type, number of residents or workers, etc. with interim annual targets), and establish the price tiering and other specific mechanisms to reduce demand. And, the City must have a means to enforce compliance with its reduction targets.

N-21

Page 2-11 et seq. Strategy 2 (Renewable Energy) identifies three actions (2.1, 2.2, 2.3), all of which propose feasible means to achieving the goal/target of 100% renewable electric energy in the City by 2035. A Community Choice Aggregation (CCA) program for San Diego must equitably address the needs of citizens for reliable, appropriately-priced energy. The City should retain oversight of the CCA while also addressing infrastructure/operational needs of the region's primary energy provider, SDG&E. Tier-pricing must balance affordability and access to meet the "lifeline" needs of low-income/disadvantaged residents, allow for "reasonable" use by the majority of users, and include higher prices for large users. Similarly, the City could establish "average/appropriate" water use amounts for residential, commercial and industrial sectors and provide incentives for users who are below the "average" and penalties for users who are above the "average" for their respective sector.

N-22

Page 2-12 et seq. (Bicycling, Walking Transit and Land Use Strategy) establishes a goal of combined 50% mode share by 2035 in the Transit Priority Areas – much of which rests on the presumption that the City of Villages concept will be key to creating conditions to foster those mode share shifts. This is a reasonable goal. However, there are no assurances that the individual or combined mode shifts will occur. For example, the specific, necessary land use changes are not identified in or required by the CAP, but are subject to subsequent community plan update processes, which are not obligated to enact the necessary changes. That is a serious flaw in the CAP. The supporting measures/actions (pages 2-13 and 2-14) would provide incentives to improve mode share, but those are not mandatory. The City should provide clear timelines and performance measures related to implementing all the proposed actions – and describe how the City will enforce them or what alternatives it will initiate to achieve the targets.

N-23

This is a critical problem for the City's CAP that has been extensively analyzed in a recent report by Circulate San Diego and the Climate Action Campaign, who concluded that: "SANDAG's own projections show that it is mathematically impossible for the City of San Diego to achieve its transit and active transportation goals with the transportation network SANDAG is currently planning." (source: [http://circulatesd.nationbuilder.com/new\\_climate\\_for\\_transportation](http://circulatesd.nationbuilder.com/new_climate_for_transportation), accessed 9/27/15). The City's CAP and PEIR must be revised to reflect the relationship between the Regional Plan and CAP, and additional measures added to the CAP, and additional mitigation measures included in the PEIR, to address the gap between what the CAP intends to implement and what it appears is currently feasible to implement.

N-24

Some of the proposed actions in the plan, such as "unbundling" parking costs, are fairly novel ideas and the City should initiate "demonstration" projects to test their effectiveness.

N-25

Pages 2-14 et seq. (Zero Waste) establishes clear targets for reducing the waste stream and utilizing/recapturing waste products. Where land use changes will increase the amount of available

N-26

**Response to Comment N-22**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment N-23**

The City's adoption of the CAP cannot legally provide for specific actions to occur in a future community plan update. Regardless, the specific performance standards called for in the comment are provided in the GHG reduction targets in the CAP. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting.

**Response to Comment N-24**

The CAP relies on SANDAG's Regional Transportation Plan to identify the City's Transit Priority Areas. The City is setting walking, biking, and transit ridership goals that will be achieved in Transit Priority Areas through the implementation of its General Plan City of Villages Strategy and other related documents such as the Bicycle Master Plan and Pedestrian Master Plan. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting.

**Response to Comment N-25**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment N-26**

This comment does not address the adequacy of the Draft EIR. Comment noted.

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open space (e.g., new or expanded parks, community gardens, and schools), the City should incorporate local green waste recycling opportunities as alternatives transporting clean waste to the major landfill.

N-26

Pages 2-15 (Climate Resiliency) proposes to establish realistic urban tree canopy targets (increase canopy 15% by 2020 and 35% by 2035) and identifies appropriate supporting measures that, if implemented, would substantially improve the City’s urban green component – two critical actions being to hire an urban tree program manager (completed in 2015) and prepare an urban tree canopy assessment (a grant has been secured to do this). The CAP should clearly identify its urban tree canopy/urban forest priorities for additional park and open space (green) and tree planting: tree-deficient communities, underserved communities and potential connectivity to natural lands (where consistent with other conservation priorities).

N-27

Page 3A-15....3.A.22 “As noted in the General Plan PEIR, Chapter 3.8, Land Use, until all of the community plans have been updated to reflect and incorporate the City of Villages strategy, there may be conflicts between the policies contained in the older community plans and the General Plan.” This raises a significant/serious problem because it will be years before the plans are modified and there are no assurances that they will be amended to comply with the CAP. The CAP (via changes to the City’s General Plan and other planning processes/documents) must provide a means to ensure that the land use/density changes that are necessary to achieve the GHG reduction targets can be met and specify the time lines for those changes – which must be linked to the three time periods (Early, Mid, Long-term) as presented in the CAP.

N-28

Page 3.A-9, et seq. identifies a host of Land Use policies/activities (LU-A 1-10) that are proposed to produce changes in City actions that will contribute to GHG emission reductions. While these policies/activities could yield the anticipated benefits, and as commented on in previous comments, there does not appear to be a mechanism/process to ensure that the General Plan policies/measures and community plans will be changed/modified to achieve the City of Villages’ strategy and concomitant climate change/GHG reduction benefits. Nor can the City rely on the SANDAG Regional Plan to facilitate the implementation of necessary smart growth actions/funding that would put the region and City onto a GHG reduction trajectory to meet the long-term GHG emission reduction targets (and meet the City’s own GHG emission reduction goals) . The City must identify and adopt implementing requirements and ensure that, overall, the City’s future “smart growth” activities are being achieved: the City of Villages strategic approach, which is expected to provide effective transit priority areas are built-out to increase transit-oriented developments and improve the jobs-housing-transportation balance, can only be effective if the City’s community plans align with the CAP’s land use expectations and are implemented on timelines consistent with those expectations.

N-29

As proposed, and with the mitigation measures implemented, the PEIR provides a reasonable rationale that it will not have conflicts with the General Plan, community plans and regional/city conservation plans. However, and as described above and previously, substantial uncertainty exists whether and how the City will ensure that the goals of the CAP can/will be met in the absence of City’s limited ability to ensure that the relevant community plans will be modified to comport with the CAP.

N-30

Page 3.B-14 et seq. The Urban Design (UD) mitigation measures address many of the concerns over retaining a sense of place – maintaining community character and visual aesthetics, open space and connectivity, improving walkability/bikability/transit access – should be included in each updated

N-31

**Response to Comment N-27**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment N-28**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment N-29**

Please see Response to Comment N-23.

**Response to Comment N-30**

This comment does not address the adequacy of the Draft EIR.

**Response to Comment N-31**

The comment appears to refer to General Plan policies that should be included in future community plans. Community plans are components of the City’s General Plans, and would therefore be applicable within individual communities.

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community plan (and on a time line that conforms to the CAP time line as the CAP is being implemented). The City must be able to ensure that these policies/measures are included in each community plan (by reference or in the documents). Similarly, mitigation measures (CE) should be included in each updated community plan.

N-31

Page 3.C-1 et seq. Many of the additional CAP activities/measures that are identified in this letter would help reduce activities that contribute to air quality problems, including PM<sub>10</sub> and PM<sub>2.5</sub> and ozone. A number of environmental groups have provided an expanded set of recommendations to reduce air quality contributions that should be added to/included in the CAP and DPEIR (e.g., Environmental Health Coalition and Climate Action Campaign scoping letters dates March 20, 2015; Coalition of environmental groups letter sent May 20, 2015).

N-32

Page 3.D-1 et seq (GHGs). The state deferred determination of the thresholds of significance to lead agencies, which could use modeling or other quantitative analyses when considering significance. The determination may include the extent of project GHG increases or decreases; whether the project emissions exceed lead agency thresholds; and regulations or requirements adopted to implement statewide, regional or local plans to reduce or mitigate GHGs. The City has adopted GHG emission (reduction) thresholds that align with, but would not fully meet the percentage reductions established in the state's GHG emission reduction policies/regulations as presented in AB 32, S-3-05 and B-30-15. The state's targets (using the 1990 baseline and relevant percentage reductions) are appropriate thresholds for the PEIR assessment of the CAP's potential impacts for the target years (e.g., 2020, 2030, and 2035). As noted previously, the CAP, if successfully implemented as proposed, would meet and exceed the City's target reduction as well as the state-based GHG reduction target for the City's "fair share" up to 2020. However, although the CAP would meet the City's proposed GHG reduction targets in 2030 and 2035, it would not fully meet the state-based thresholds for 2030 and 2035 (see comments for pages ES-2 and 2-1). Because the CAP is presuming to conform to the state's GHG emission reduction targets and use those as the thresholds of significance, then the DPEIR should make a finding that a Significant Effect would occur as a result of implementing the CAP – and provide additional mitigation measures. Alternatively, the CAP could be amended to include strategies and measures (some of which are recommendations in this letter) so that the proposed project/CAP avoids those impacts.

N-33

Page 3.D-20, paragraph 3 has a typographical error; the sentence should state that the CAP's target is 15% [not 25%] below the City's 2010 baseline by 2020.

N-34

Page 3.F-15. This section uses LOS (level of service) as the City's criterion for traffic/circulation effectiveness. There is considerable information regarding the increased effectiveness of using VMT (Vehicle Miles Traveled) vs. LOS as a significance criterion parameter for transportation impact. Proposals to amend CEQA law are already in the CA legislative process to require a project's impacts to be assessed using VMT rather than LOS, and the City should replace LOS with VMT as the appropriate significance measure for traffic/circulation effectiveness.

N-35

Page 3.H-1 et seq. (Water Supply, Coastal Resources, Water Resource Management). As described in prior comments, the City of San Diego should substantially reduce water consumption, following guidance provided by its Water Task Force and the examples of other cities/municipalities that face serious water supply/demand challenges. The measures in the PEIR (e.g., PF-H.1, H.2) call for optimizing use of imported water and improving reliability, improve water storage capacity and better integrating

N-36

**Response to Comment N-32**

Comment noted. The City will consider these recommendations as policies in the CAP are developed during implementation.

**Response to Comment N-33**

See Response to Comment N-6.

**Response to Comment N-34**

Comment noted. The text on Draft EIR page 3.D-20, paragraph 3, has been revised, as follows:

Consistent with AB 32, the CAP sets a GHG target for 2020 equivalent to ~~25~~ 15 percent below the City's 2010 baseline emissions, which is equivalent to 11.1 MMT CO<sub>2</sub>e.

**Response to Comment N-35**

The California Governor's Office of Planning and Research issued a draft set of guidelines on August 6, 2014, and are in the process of developing a revised draft which will be released for additional public review. Because these guidelines are still in development at this time, they have not been incorporated into the Draft EIR for the CAP. The Draft EIR's transportation analysis relied on the City's CEQA Significance Determination Thresholds (City of San Diego, 2011).

**Response to Comment N-36**

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter N

local and regional and state planning. And the CAP includes proposals for some reduction in water use. However, as a number of other local governments have demonstrated (described earlier), water use can be significantly reduced to the range of 55-65 gpd while maintaining economic, social and environmental quality of life. The CAP should increase its water conservation targets, which also will contribute to lower GHG emissions.

N-36

Page 5-1 et seq. The PEIR states: "The General Plan includes proposed roadway improvements that have been designed to support the General Plan Land Use Diagram and to maintain the City's proposed level of service (LOS) standard of LOS D, where feasible and appropriate. The General Plan does not include any provisions requiring the oversizing of infrastructure facilities to serve growth not anticipated in the General Plan." As noted in prior comments, the CAP relies on the regional transportation system network (as detailed in the various SANDAG RTP/SCS and Regional Plan documents) that underutilizes smart growth/transit opportunities and does overemphasize a reliance on highways/roadways. While both the "transit-first" and "roadway first" approaches are intended to serve the same level of growth, they are not comparable approaches. The transit approach is more effective with and promotes smart growth/transit priority area planning (i.e., more efficient, less-sprawling growth). Although LOS has been a standard measure of a project's local effects on traffic/circulation, the CAP should adopt VMT as a measure of traffic/circulation effects (or use it in conjunction with LOS) because the essential measure of the CAP is how it reduces GHG emissions – for which VMT is a much better measurement parameter than is LOS.

N-37

Page 11-1 et seq. (Mitigation Monitoring and Reporting Program) The proposed MMRP addresses only those issues that were identified to have potentially significant impacts and describes specific mitigation measures to address those impacts. However, the CAP and PEIR identify a large number of strategies and measures (some specific, some fairly generic that have to be further refined) that are necessary to implement the proposed project/CAP. Additionally, as noted throughout these comments, a number of additional measures should be included/added to the proposed CAP in order to achieve certain thresholds (e.g., mitigation measures that would help the City to meet the state's 1990-baseline based GHG targets, thereby achieving the City's "fair share" contribution to those reductions).

N-38

The MMRP should be expanded to describe how each of the strategies and measures in the CAP/PEIR will be monitored and reported, and importantly how the City will respond if it determines that the measures are not being implemented or are not producing the projected (GHG-reducing) results. If the City intends to use existing or other procedures to monitor and report on all of the various measures that are identified in the CAP, then this MMRP must clearly identify who, where, how often, etc. that monitoring and reporting will occur and how it will be utilized by the City to ensure that all elements of the CAP are being effectively implemented and are producing results.

Screening Criteria

The City states the proposed screening criteria were formulated on the "gap-based" approach, which is an accepted method that has been utilized by other local governments in California. It applied historical data and information that the City has regarding past projects/GHG, and assumptions about the types and number of projects it anticipates to process through 2020. As a result, the City determined that a (discretionary) land use project that would emit less than 1,350 MT CO<sub>2</sub>e/year would result in a less-than-cumulatively considerable (less-than-significant) GHG impact – and thus be exempt from further

N-39

**Response to Comment N-37**

See Response to comment N-35.

**Response to Comment N-38**

Comment noted. Chapter 11, Mitigation Monitoring and Reporting Program (MMRP) of the Draft EIR, identifies the required mitigation measures by resource topic that would be included in a MMRP. A separate MMRP will be prepared and adopted in accordance with CEQA Guidelines Section 15097. The CAP strategies are part of the project analyzed in the Draft EIR. Please see Response to Comment N-3 and CAP Chapter 3 regarding CAP implementation monitoring and reporting.

**Response to Comment N-39**

The Draft Climate Action Plan Consistency Checklist and Draft Screening Criteria for Greenhouse Gas Emissions will not be adopted as a part of the Climate Action Plan. Please see Response to Comment N-3.

Comment Letter N

GHG analysis/assessment. Specifically the City’s approach would be as follows: “The first step in determining compliance would be to determine whether the project’s GHG emissions level is above or below the Screening Criteria. Projects with GHG emissions below the Screening Criteria would not be considered to have a significant impact. Projects with GHG emissions above the Screening Criteria would have to complete the CAP Consistency Checklist. Projects above the Screening Criteria that could not demonstrate compliance with the CAP would be considered to have a significant GHG emissions impact. A GHG impact analysis would be needed in the project’s CEQA document.”

The threshold criterion of 1,350 MT CO<sub>2</sub>e/year represents about 0.012 percent of the anticipated 11.1 MMT CO<sub>2</sub>e annual GHG emissions for the City in 2020, which on an individual project basis is a small contribution to the total (cumulative) emissions – even though according to the Screening Criteria in Tables 5, 6 and 7 (for single use, mixed use and municipal developments) that criterion allows fairly large developments (e.g., 90-220 single development units; 1.76 million square feet parking structure) to qualify under the GHG threshold. It is unclear in the document how a project that is calculated to produce less than 1,350 MT CO<sub>2</sub>e/year would address its GHG emissions. That is, does the City’s CEQA process still require the “exempt” project to incorporate avoidance and minimization measures, as applicable, and comply with specific GHG emission reduction measures that are identified in the CAP?

The City must track and report the GHG emissions from all projects, regardless whether they are exempt from the cumulative GHG impact analysis, so that the City can demonstrate that it is appropriately implementing the CAP – or initiating actions to ensure that the CAP is achieving its targets.

While not required as part of the CAP/PEIR process, the City must soon initiate the development of its climate adaptation plan (a very preliminary version is included in Alternative B – the CMAP). When that effort is initiated/reinvigorated, please notify me of any public meetings/workshops and committees that will be responsible for preparing that document.

Thank you for considering these comments and recommendations in City’s the CEQA review and the final version of the CAP.

Sincerely,



Bill Tippets

N-39  
N-40  
N-41

Response to Comment N-40

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting.

Response to Comment N-41

Comment noted.



Comment Letter O

September 25, 2015

Rebecca Malone  
City of San Diego  
DSDEAS@sandiego.gov

Comments regarding the City of San Diego Climate Action Plan, SCH NO: 2015021053

To Whom It May Concern:

Green Cites California (GCC) is a network of the more progressive cities and counties in California, and a primary focus of our members is the adoption of climate action plans that will meet the needed greenhouse gas (GHG) emissions reductions targets. We seek to accelerate the adoption of best practices both in CA and throughout the United States.

I want to commend the City for a strong Climate Action Plan (CAP), a culmination of more than 5 years of extensive coordination and collaboration between City staff and the community. I have one recommendation that is significant in meeting GHG reduction goals. The reduction of electricity and gas consumption in existing buildings is essential. I urge the City of San Diego to adopt a **mandatory benchmarking and disclosure ordinance for commercial residential and nonresidential buildings**. This is currently underway in San Francisco, Berkeley, and Los Angeles. By so doing, the City will be able to provide recommendations to the low-performing building owners and can celebrate the best practices of building owners who have taken a leadership role. With the passage of AB 802, data access from San Diego Gas and Electric will be mandated by California. This had been one of the prominent challenges and is no longer an issue.

O-1

The City of San Diego is a member of GCC and is aware of the excellent ongoing work in CA. I would be happy to help facilitate a more in-depth exchange of information between our member cities if that would be helpful.

Thank you again for the opportunity to comment on the City of San Diego CAP.

Sincerely,

Linda Giannelli Pratt  
Managing Director, GCC

[www.greencities-california.org](http://www.greencities-california.org)

Berkeley • Chula Vista • Hayward • Los Angeles • Manhattan Beach • Marin County • Oakland  
Palo Alto • Richmond • San Diego • San Francisco • San Jose • Santa Barbara • Santa Monica

Linda Giannelli Pratt, Managing Director LindaPrattGCC@gmail.com

Response to Comment O-1

Comment noted. Regarding commercial building energy disclosures and benchmarking, please also see Response to Comment K-3.

Comment Letter P

San Diego Unified Council of PTAs



2375 Congress Street, San Diego CA 92110-2318 • (619) 297-7821 • info@sdccouncilpta.org • www.sdccouncilpta.org

September 25, 2015

Mayor Kevin Faulconer and Councilmembers  
City of San Diego  
202 C St., 11th Floor  
San Diego, CA 92101

RE: **Support for Climate Action Plan and 100% Renewable Energy**

Dear Mayor Faulconer and San Diego City Councilmembers,

I represent the San Diego Unified Council of PTAs with 76 PTA schools in the San Diego Unified School District and 11,000 PTA members in the City of San Diego.

The Executive Board of the San Diego Unified Council of PTAs strongly supports the Climate Action Plan draft as released by Mayor Faulconer in July 2015.

Climate change is one of the greatest threats to human existence. We as a community must act to find common sense solutions to protect public health and our quality of life for future generations. San Diego has a wealth of local, clean energy solutions, and we support the Mayor's vision of making San Diego the green energy capital of the world.

It is the role of PTA to speak for children who will bear the brunt of climate change. The San Diego Unified Council of PTAs authored a resolution **Climate Change is a Children's Issue** adopted by the California State PTA in May 2015 and endorsed by the San Diego Unified School District Board of Education. The resolution encourages PTAs to support legislation to substantially reduce man-made contributions to climate change and to mitigate its impact on children's health.

We urge you to act as quickly as possible to pass this strong, legally binding climate plan.

Sincerely,

Celeste Bobryk-Ozaki  
President, San Diego Unified Council of PTAs

cc: San Diego Unified Council of PTAs Executive Board

P-1

Response to Comment P-1

Comment noted.

Comment Letter Q



September 28, 2015

Ms. Rebecca Malone  
Associate Planner  
City of San Diego Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

Sent via email: dsdeas@sandiego.gov

RE: Draft PEIR – City of San Diego Climate Action Plan

Thank you for the opportunity to comment on the Draft PEIR for the City's Climate Action Plan. SanDiego350 is a non-profit, all-volunteer, organization with over 6,000 members throughout San Diego County. We are concerned about climate change and its very real effects on our livelihoods, well-being, and the future for our children.

We commend the greenhouse gas reductions of the Climate Action Plan. These legally binding targets are in line with California's 2020 and 2050 targets, and are important precedents for other climate action plans. We support 100% clean energy by 2035, and believe Community Choice Energy is the best way to achieve this goal. It will ensure that decision-making is kept local, maximize local jobs, and be the most cost effective. We also support the language in the draft CAP for the development of a climate adaptation document. We urge you to make this a mandatory action item, to ensure the City is prepared to respond to the unavoidable impacts of climate change. Additionally, we strongly support measures to improve social and environmental equity, such as integration of affordable housing and middle-class job creation into all greenhouse gas reduction targets, increasing access to jobs and services by providing better public transportation options, and prioritizing disadvantaged communities for clean energy.

Q-1

Auto emissions account for 54% of greenhouse gasses in San Diego. To reduce those emissions, there should be stronger commitments to increase active transportation and transit infrastructure in the CAP. The City should work with SANDAG to prioritize transit options over freeway expansion. This is essential if the City is to meet and exceed the emission reduction goals of 15 percent below the 2010 baseline by 2020, 40 percent by 2030, and 50 percent by 2035. As noted in the CAP, the challenge to reduce emissions must be shared by the entire community. Therefore, we would urge putting more effort into influencing external policies that will impact the City's ability to successfully implement the CAP. Working to influence SANDAG as well as state legislators would help ensure the success of the City's efforts.

Q-2

In order to reduce the average vehicle commute, the CAP should promote transit-oriented development wherever possible. Therefore, we urge improving measures to enforce the City of Villages growth strategy. This kind of planning should be the norm in San Diego. Many of the fastest growing communities in the City are now in the process of Community Plan Updates. In order to meet the carbon emission reduction targets, the City should incorporate Climate Action Plan Goals, Targets and Actions into all community plan updates. The City of Villages growth strategy should be an enforceable part of the CAP's housing policy.

Q-3

**Response to Comment Q-1**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment Q-2**

Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting.

**Response to Comment Q-3**

Comment noted. Please see CAP Strategy 3 regarding promotion of transit-oriented development. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting. Please also see Response to Comment N-31.

**Comment Letter Q**

Most importantly, there should be stronger commitments and a concrete outline for implementation. Identifying the proper staffing, financing and funding needed to implement the plan and to reach the goals and targets outlined in the draft is a much-needed first step.

Q-4

Thank you for considering our recommendations as part of the public review process. SanDiego350 is a community partner in achieving these critical goals and will continue to support strides in climate change mitigation and adaptation through public education and advocacy.

Sincerely,  
Joyce Lane, Public Policy Team  
SanDiego350

**Response to Comment Q-4**

Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting.

## Comment Letter R



September 28, 2015

Rebecca Malone, Associate Planner  
City of San Diego Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

**RE: Comments on Draft PEIR for San Diego Climate Action Plan**

PROJECT NAME: San Diego Climate Action Plan  
SCH NO.: 2015021053  
COMMUNITY AREA PLAN: All Community Plan Areas  
COUNCIL DISTRICT: All Council Districts

Dear Ms. Malone,

I am writing to provide SolarCity's comments on the Draft Program Environmental Impact Report (PEIR) that the City of San Diego has prepared for the San Diego Climate Action Plan (CAP). Our comments focus on the proposal to adopt a Community Choice Aggregation (CCA) program to leverage the City's purchasing power for renewable sources of energy, which SolarCity strongly supports.

SolarCity is California's leading full service clean energy provider and offers cost-effective financing that enables our customers to go solar without large upfront costs. SolarCity has more than 6,000 California employees based at more than 35 facilities across the state, including more than 300 employees at our San Diego facility located at 5183 Mercury Point.

SolarCity supports the conclusions in the Draft PEIR that adopting a CCA would result in minimal negative environmental impact and instead would produce an environmental benefit by helping the City meet its greenhouse gas (GHG) emission reduction goals. As discussed in the CAP, CCAs are an effective way for communities to increase the portion of their electricity supplied by renewable energy.

According to the United States Environmental Protection Agency, many municipalities pursue CCAs to increase their reliance on renewable energy and reduce their greenhouse gas emissions above what most traditional utilities offer<sup>1</sup>. This improvement over traditional utility service is

R-1

<sup>1</sup> United States Environmental Protection Agency. (Producer). (2012). *Community Choice Aggregation: Leveraging a Collective Procurement Model to Drive New Renewable Energy Generation*. [Video webinar]. Retrieved from [http://www.epa.gov/greenpower/events/6mar12\\_webinar.htm](http://www.epa.gov/greenpower/events/6mar12_webinar.htm)

**Response to Comment R-1**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Comment Letter R**

crucial as local governments work to meet the state’s ambitious clean energy and GHG emission reduction goals. Moreover, CCAs offer their customers electric rates that are competitive with if not lower than private utilities, and they promote consumer choice and local control<sup>2</sup>.

Given these benefits, cities and counties throughout the state are exploring adopting a CCA model. San Diego would be part of a growing movement to reimagine the way its constituents purchase power. By adopting a CCA, San Diego is sending a message to renewable energy companies that the City is open for business, and that renewable energy companies should invest in creating local jobs in the region. A CCA solidifies San Diego as a cutting edge city that supports innovation and securing local job creation and investment.

Thank you for the opportunity to comment on the Draft PEIR. We look forward to continue providing clean energy to the San Diego community.

Sincerely,



Gina Goodhill Rosen  
Deputy Director, Policy & Electricity Markets  
SolarCity

↑  
R-1

<sup>2</sup> "What is a CCA." *Lean Energy US*. N.p., n.d. Web. 18 Sept. 2015

Comment Letter S

September 28, 2015

Ms. Rebecca Malone  
Associate Planner  
City of San Diego Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

PROJECT NAME: San Diego Climate Action Plan  
SCH NO.: 2015021053

Dear Ms. Malone,

The Sustainable Energy Advisory Board (SEAB) for the City of San Diego convened a meeting on September 24, 2015, to formalize comments on the City of San Diego Climate Action Plan Draft EIR (CAP), the members present agreed in a 5-2-0 vote to submit the following comments.

The SEAB is proud of the City of San Diego's effort to develop a comprehensive and enforceable CAP. We fully support implementation of the plan and are pleased to have an opportunity to review it and to provide our comments.

California has become a leader and a role model for climate action because of its proactive policies to reduce greenhouse gas (GHG) emissions. Implementation of the City's CAP will provide substantial benefits such as reducing dependence on imported water and energy, diversifying energy supply, saving taxpayers money by decreasing water, energy usage and waste, achieving public health benefits, and creating "green" jobs through incentive-based policies.

San Diego's CAP is a set of strategies to be implemented by the City to support and complement actions at the state and federal level. The City's key strategies include: 1) Energy and Water Efficient Buildings, 2) Clean and Renewable Energy, 3) Bicycling, Walking, Transit & Land Use, 4) Zero Waste (Gas and Waste Management), and 5) Climate Resiliency. The specific action items with largest contribution to GHG reductions, and therefore the highest priorities, are as follows: 1) the proposed transition to 100% renewable energy on the city-wide electrical grid by 2035, 2) the increased use of mass transit by implementing the General Plan's Mobility Element and the City of Villages strategy, 3) the reduction of vehicle miles traveled through effective land use focused in Transit Priority Areas, 4) the diversion of solid waste and the capture of landfill methane, and 5) restoring green infrastructure by a robust urban forestry program. Much of the local action identified within the CAP includes partnering with other regional agencies. We encourage the City, in its partnership role, to actively advocate for the achievement of the CAP goals.

Although we agree with the strategies and associated key action items, we offer the following comments for consideration in implementation and development of supporting policies:

1. In many cases, the action items in the plan simply state that a proposal will be presented to the City Council for consideration. Although, the SEAB intends to support and offer assistance however needed, we would like to work with City staff as the specific policies

S-1

S-2

Response to Comment S-1

Comment noted.

Response to Comment S-2

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter S

and ordinances are being developed. Further, we note that there is—and will be—a need to vertically integrate the CAP into current City policy and the development of the Community Plans that are underway. The success of the CAP will result from appropriate ongoing prioritization and budgeting that considers each action for cost-effective and equitable solutions to greenhouse gas emissions reductions. We are encouraged that the City is already investing in the implementation of the CAP in advance of the formal adoption by the City Council.

2. Should there be favorable results regarding the feasibility study of either Community Choice Aggregation (CCA) or an alternative plan, we propose that Action Item 2.1 be given higher priority and moved to Phase 1.

3. Many highly energy efficient products and technologies are already available and ready for deployment. The City should regularly examine its regulatory and incentive programs to determine whether there are cost-effective opportunities to encourage adoption and speed deployment of approaches and technologies that can support the GHG reduction goals of the CAP with the support of the private sector.

4. The state and federal regulatory environment is changing. The CAP was developed in response to AB 32 and the California Air Resources Board's (CARB) subsequent Scoping Plan, SB 1078, SB 107, SB 2, AB 758, several executive orders and other actions. However, new rules have been published or are under consideration (EPA's Clean Energy Plan, published in August of 2015, SB 350, and SB 32 to name a few). There's a need to monitor regulatory trends and to update the CAP as needed to stay current.

5. Targets are set using a baseline of 2010; it is now near the end of 2015. Monitoring should be updated as part of an annual update to show the current state of San Diego's GHG emissions. Looking at which trajectory the City has been on since the 2010 baseline was established will help determine if current actions can ensure compliance with the long-term goals. Annual updates should also include the best available data on distributed generation and utility power acquisition mix.

6. Energy Efficiency in Commercial and Multifamily Buildings is critical to achieving San Diego's climate goals. Including the AB 758 "Existing Buildings Energy Efficiency Action Plan" in the CAP is a step in the right direction to achieve energy efficiency in all buildings. However, Strategy 1: Water and Energy Efficient Buildings should include a commercial and multifamily energy efficiency goal, with a benchmarking and transparency ordinance. This will ensure the City is able to measure its progress towards cost-effective carbon reductions through building-level energy benchmarking, which is a recognized industry best practice.

Including a commercial and multifamily energy savings goal demonstrates that the City understands that all buildings must be included if we want to achieve our climate action targets. Previous barriers to whole-building data access needed for successful benchmarking are addressed in the recently passed AB 802, currently awaiting the Governor's signature. This legislation was passed with broad support from local governments, the Building Owner and Managers Association of California, the US Green Building Council California, the Efficiency Council, San Diego Gas & Electric, and other key industry stakeholders.



**Response to Comment S-3**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment S-4**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment S-5**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment S-6**

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment S-7**

Comment noted. Regarding commercial building energy disclosures and benchmarking, please also see Response to Comment K-3.

Comment Letter S

With the adoption of the AB 758 Action Plan and passage of AB 802, it is clear that commercial and multifamily buildings in San Diego will be compelled to benchmark and publicly report building energy use information in the coming years.

These state level legislative directives only add to the rising need for the CAP to outline a local ordinance for commercial energy transparency and goals that best fits the unique needs of San Diego, while also meeting statewide energy efficiency goals. This is an opportunity for San Diego to show its leadership on climate issues and benefit from resources for local governments to meet these targets. Aligned local action will ensure that this legislation will be done in the best interest of San Diego stakeholders.

- 7. Moving forward, the City should adopt a broader definition of the green economy for the CAP that includes a more complete description of the full spectrum of opportunities and commitment to local equitable growth. In addition, there is a need to ensure committed equity in allocation of resources so that communities of concern are able to participate and realize benefits of energy efficiency, renewable energy installations, urban forestry, public health benefits, and job creation, without carrying undue burden of cost.

Once methods for assessing job creation are agreed, targets should be set and progress tracked for each community planning area. According to the Bureau of Labor statistics, jobs in research and development, manufacturing and distribution, installation, and maintenance of products or services in any of the following categories could be considered "green jobs:"

- Energy from renewable sources – electricity, heat, or fuel generated from wind, biomass, solar, ocean, hydropower, biomass, landfill gas, and municipal solid waste;
- Products and services that improve energy efficiency such as energy efficient equipment, appliances, buildings and vehicles, as well as products and services that improve the energy efficiency of buildings and efficiency of energy storage and distribution such as smart grid technologies. Cogeneration is included in this category;
- Products that reduce or eliminate the creation or release of pollutants or toxic compounds, remove pollutants or hazardous waste from the environment, reduce greenhouse gas emissions, reduce or eliminate creation of waste materials, or collect, reuse, remanufacture, recycle, or compost waste materials or wastewater;
- Natural resource conservation, including products and services related to organic agriculture and sustainable forestry, land management, soil water or wildlife conservation, and stormwater management; and
- Environmental compliance, education and training, and public awareness-products and services that enforce environmental regulations, provide education and training related to green technologies and practices, or increase public awareness of environmental issues.

The CAP establishes the requirements for future policy with regard to greenhouse gas emissions targets. We request that the City clearly identify the methods, metrics, and milestones for green jobs and include numeric commitment targets for these jobs and economic development over the life of the plan. Monitoring and enforcing the economic



Response to Comment S-8

This comment does not address the adequacy of the Draft EIR. Comment noted.

Response to Comment S-9

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter S

development metrics and milestones should be included in regular updates to the Mayor, City Council, and the community.

S-9

- 8. We encourage the Mayor and City Council to provide separate budget lines for the CAP as part of the budgeting cycle for each department. Regular updates should be made to assure that policy goals are on track and that implementation is being accomplished in the most cost-effective way. The Sustainability Program Manager should have adequate resources and be empowered to move forward with budgeted items.

S-10

- 9. Adaptation to effects of climate change that can no longer be avoided. The CAP acknowledges that a comprehensive plan for adaptation to the unavoidable effects of climate change should be developed. We agree with this priority. It should include public health issues, biodiversity, coastal resources, water, agriculture, forestry, transportation, and energy.

An urban tree planting program is the only specific tactic mentioned in the CAP for adaptation to unavoidable climate change effects – the SEAB is supportive of this goal. Appropriate installation of the urban forestry measures proposed as adaptation measures needs to include safeguards that do not interfere with the potential for rooftop and parking lot solar energy installation. Installation guidelines need to be coordinated to achieve the maximum benefits of each measure – shade, carbon absorption, and electric generation. PV installations, by creating shade, can significantly reduce heating loads on buildings and parking areas as well as contribute to the charging infrastructure for expansion of electric vehicles.

S-11

The Sustainable Energy Advisory Board is grateful for the opportunity to provide comments on the City of San Diego's CAP. We expect to be engaged throughout the development of future policy and in the implementing and monitoring of those policies that align to the CAP.

If you or any members of your staff have questions on this, please do not hesitate to contact us.

Sincerely,

John Bumgarner  
 Chairman  
 City of San Diego Sustainable Energy Advisory Board

Cc: Kevin Faulconer, Mayor  
 San Diego City Council  
 Mike Hansen, Director of Land Use & Environmental Policy, Office of Mayor Faulconer  
 Brian Schoenfisch, Senior Planner, Planning Department  
 Cody Hooven, Sustainability Manager, Economic Development Department

Response to Comment S-10

This comment does not address the adequacy of the Draft EIR. Comment noted.

Response to Comment S-11

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter T

From: [Erka Morgan](#)  
 To: [DSD EAS](#)  
 Subject: Fwd: Comments regarding San Diego Climate Action Plan, SCH NO: 2015021053  
 Date: Monday, September 28, 2015 7:19:00 PM

Attention: Rebecca Malone

Dear Ms. Malone,

I wish to join many other residents of San Diego in supporting a strong Climate Action Plan (CAP). As a new resident (2011) of District 3 in Little Italy, I have been drawn to stay in San Diego by the quality of both the climate AND the City's visible track record of "doing its homework" on important issues affecting the City's future. Unlike other cities in which I have lived, San Diego takes its responsibilities to future residents seriously. As a result, I feel optimistic about investing my future in this City, *because* I see evidence that San Diego IS trying to remain a livable and hospitable City into the future.

Accordingly, I'd like to make the following statements about the draft Climate Action Plan:

+ It is vital that this Plan stay strong -- As it is finalized, there must be no changes to the current actions, measurable objectives AND/OR to the "teeth" it contains, to achieve and enforce realization of those objectives. Under no circumstances should this Plan be weakened or "watered down" in any way. I define "Watered down" as any reductions to the emissions savings targets or to the mechanisms of enforcement.

T-1

+ Maintain the Transportation Targets -- As transportation emissions are over 50% of the City's current climate emissions, reducing those must remain the most central focus and strongest commitment. I fully support Strategy 3, all parts. As a resident *who has been car-free in Little Italy for four years*, I can attest that San Diego's trolley-bus-transit system is currently strong. However, despite coordination between buses and trolleys, accessible bus schedules, and decent coverage to many areas of the city, there are still many, many gaps. Finalizing the current transit and walking objectives (3.1 - 3.3) will trigger additional efforts to improve the overall system. This will bring economic and livability-improvements, as well as reductions in climate emissions. These targets must be maintained, even if SANDAG's related measures are less aggressive and therefore in conflict.

T-2

+ Maintain the Clean Energy Targets -- Objective 2.1 is essential, however the implementation deadline should be moved forward to 2020, not 2035. CCA formation begins with passage of a City ordinance, which could be done in 2016. As has been shown by Lancaster Choice Energy, the newest CCA, implementation of clean electricity choice can begin within the following year. There is no reason to delay capture of these CCA-based economic and emissions benefits to 2035.

T-3

+ Climate Resiliency -- Objective 5.1 is a laudable step toward increased City climate resiliency, but it addresses only a fragment of the "resiliency" needed. All municipal buildings within the expected sea- and flood-level rise areas projected by 2035 should be assessed within the time frame of this plan for the nature of each building's resiliency strategy. By 2035, will that building face foundational water damage and/or greater destruction? Or will it have been replaced by then - and if so, what will be the prudent design

T-4

Response to Comment T-1

This comment does not address the adequacy of the Draft EIR. Comment noted.

Response to Comment T-2

This comment does not address the adequacy of the Draft EIR. Comment noted.

Response to Comment T-3

This comment does not address the adequacy of the Draft EIR. Comment noted.

Response to Comment T-4

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Comment Letter T**

standards for the successor building(s)? The Plan contains no measures that deal with the resiliency of the built environment, an oversight, in my opinion.

↑ T-4

Overall, I find the draft San Diego City Climate Action Plan to be fully supportable in its current form. I urge that the Council vote to accept the Plan and to support its full implementation.

I applaud the efforts of the Planning department to develop this draft, and offer thanks to all staff who have worked long and hard to bring it to and through this level of public review and understanding.

↑ T-5

If there are any questions on my comments, need for clarification or elaboration, please do not hesitate to contact me at the contact points below. Best wishes,

**Erika Morgau**  
**Energetic Management Associates**  
[Linkedin.com/in/erikamorganema](https://www.linkedin.com/in/erikamorganema)  
[energeticmgmt@gmail.com](mailto:energeticmgmt@gmail.com)  
[207-607-0707](tel:207-607-0707)  
[619-894-6707](tel:619-894-6707)

**Response to Comment T-5**

Comment noted.

Comment Letter U

September 28, 2015

Rebecca Malone, Associate Planner  
City of San Diego Planning Department,  
1222 First Avenue, MS 501  
San Diego, CA 92101  
Via email: DSDEAS@sandiego.gov

PROJECT: San Diego Climate Action Plan  
SCH NO.: 2015021053

Dear Ms. Malone,

The City of San Diego Environmental and Economic Sustainability Task Force (EESTF) was established by the City Council in October 2010 as an independent advisory body to work with City staff on the development of the Climate Action Plan.

As such, the EESTF is pleased to offer support for the Climate Action Plan Draft EIR with consideration for the following comments:

1. **Strategy 1, Energy & Water Efficiency Buildings, Action 1.1 (Residential Buildings) and New Action for Commercial Buildings.** The EESTF notes that reductions in overall energy consumption affect the magnitude of other measures; prioritizing efficiency first would align to the statewide California's Loading Order for Electricity Resources and makes other aspects of the CAP feasible, such as such as the 100% renewable energy goal.

The EESTF believes residential disclosure alone will not be adequate to meet the goals in the CAP. Consideration should be given for energy use benchmarking and public disclosure for private projects including commercial and multi-family residential (as had been proposed in a prior draft of the CAP), as managing energy use effectively starts with measuring and knowing what the options are, and commercial and multifamily buildings are large users of energy and represent the cost-effective, low-hanging fruit for efficiency and conservation. If greenhouse gas emission goals are not met, as documented in annual CAP reports, then retrofit mandates should be considered as future action to meet the emission reductions targets for Strategy 1, Action 1.1.

Education and outreach should be a part of the disclosure process, including information on available funding and financing programs. Publicly disclosing the summarized scores would allow the City to assess if energy programs are having the desired results and where to most effectively allocate outreach and monetary resources. For example, the City could target funding towards the least efficient multifamily housing and other building types service low-income residents.

The California Energy Commission has made clear in its Existing Buildings Energy Efficiency Action Plan (2015) it is looking for local governments to play a leading role and it intends to make funding available for such efforts. The City of San Diego would be wise to take advantage of these funds and be in control of its energy efficiency future in a way that best suits San Diego.

Additionally, there may be a discrepancy with the appendix and the target for Action 1.1. The July 2015 CAP includes the following for Strategy 1.1 "Reduce energy use by 15% per unit in 20% of residential housing units by 2020 and 50% of units by 2035," whereas Appendix B, Table 3 has slightly different values for percentage of units participating in the disclosure ordinance. Table 3 also



Response to Comment U-1

Comment noted. Regarding commercial building energy disclosures and benchmarking, please also see Response to Comment K-3.

Response to Comment U-2

Please see Chapter 2, Project Description, in the Final EIR. The Project Description has been revised to reflect current GHG emissions reductions modeling and methodology. These changes reflect the revisions to the CAP and CAP Appendix A.

**Comment Letter U**

City of San Diego EESTF  
 Comments on the City of the Climate Action Plan, July 2015 Draft  
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highlights a potential significant discrepancy in the percentage of units that are targeted to participate in "Efficiency Activities."

EESTF asserts that the greenhouse gas emission reduction target should not be lowered as the targets for Strategy 1.1 are reconciled. Please explain how the methods will be corrected to meet the target.

**2. Strategy 1, Energy & Water Efficiency Buildings, Actions 1.1-1.5.** The EESTF would like to see the water use reduction strategies that have been implemented across the City in response to the mandated water use reductions become permanent elements of the Climate Action Plan.

**3. CEQA streamlining Checklist and Thresholds should be strengthened to be consistent with the CAP and General Plan.** As the purpose of CAP Appendix A, Climate Action Plan Consistency Checklist is to allow exceptionally environmentally sustainable projects to have streamlined review of the greenhouse gas portion of CEQA; the checklist should require the projects actually be exceptionally environmentally sustainable.

First, the Land Use and Transportation Checklist Part 1 should make being located in a Transit Priority Area a threshold question. This emphasis on dense, transit-oriented development is necessary to reduce Vehicle Miles Travelled (VMTs) that are so critical to achieving the overall GHG goals.

Second, the Energy and Water criteria in Checklist Part 2, Question 1 should minimally use 15% better than State Title 24, Section 6 standards, rather than "average". However, it would be more appropriate to require Net Zero Energy, as the City's General Plan Policy CE-A5 calls for all new development and major redevelopment to be net zero energy consumption by 2020 for residential and 2030 for commercial construction.

Further, Question 2 in Part 2 water efficiency and conservation targets should be strengthened, given that San Diego is facing drought as the new normal of living, and the City's Water Task Force recommends reducing water use by 35% or more. In addition, EESTF requests that the City make permanent the current, temporary drought conservation measures, as a supporting measure in Strategy 1.

**4. The CAP should reflect minimum standards of new state regulations including SB 350 (2015, de Leon) AB 802 (2015, Williams).** While these pieces of legislation have not (at the writing of this letter) been signed into law by the Governor. The legislative intent is clear—coupled with the AB 758 Action Plan that has been released by the state in August 2015—that existing building will be subject to energy disclosure and retrofit.

The following additional comments shall be considered as the Climate Action Plan is implemented to ensure the intent of the CAP is maintained and tracked throughout its life:

**5. Strategy 1, Energy & Water Efficiency Buildings and Strategy 3 (Transportation and Land Use), new supporting measure.** Develop a community planning tool and checklist to align to CAP for review with the EIR. Following from the approach developed by the Pacific Beach Planning Committee as it relates to the Pacific Beach EcoDistrict (referenced in the CAP) a tool shall be



**Response to Comment U-3**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment U-4**

Please see Response to Comment N-3.

**Response to Comment U-5**

The CAP assumes 50 percent of electricity will be provided by renewable energy by 2030 which is consistent with SB350.

AB 802 effectively replaces AB 1103. Reductions in the CAP are assumed based on AB 1103, with the expectation that AB 802 will achieve similar or greater reductions, and not less. The details and programs for AB802 have not yet been developed. As stated in the CAP (page 29), "improvements in energy technology and efficiency, transportation technology and fuels, building standards, consumer behavior, and future federal and state regulations may warrant re-visiting the actions over time." Please also see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Calculations were developed in July 2015 under current regulations. Due to the necessity to complete the calculations and finalize the document, any regulatory/legislative changes that occurred after calculations were completed will be included in future CAP updates. To date, regulatory changes that occurred in the latter half of 2015 are anticipated to increase greenhouse gas reductions, which would contribute an even greater amount to the anticipated reductions under the CAP.

**Response to Comment U-6**

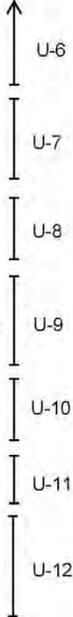
Comment noted. Also, please see Response to Comment N-3.

Comment Letter U

City of San Diego EESTF  
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developed to vertically integrate the screening criteria to the development of community plans. This is a critical tool for implementing the CAP and ensuring San Diego promotes transit-oriented development that is affordable and helps people commute to work, school, and other necessities.

- 6. Integrate prioritization criteria presented in Chapter 4 throughout CAP and to inform implementation plan. The EESTF acknowledges that not all measures will be implemented City-wide concurrently—target funding for communities of concern as described in the Social Equity and Job Creation Chapter.
- 7. Identify strategy and action items that have a longer development lead time to ensure that deadlines can be met. Action on the development of the Community Choice Aggregation or alternative plan should be considered a long-lead item and included in Phase 1 of the CAP.
- 8. The EESTF recommend the development of a detailed first-year implementation plan and budget. Staff should develop a detailed 12-month action plan that identifies specific measures, metrics and milestones that can be used to report on CAP progress, as well as the associated budget necessary, to ensure this plan has the resources to get put into action.
- 9. EESTF sees ongoing support and funding as a critical component of the CAP. Full integration into the department budgeting process will ensure successful, ongoing support of the Climate Action Plan.
- 10. The EESTF recommends the development of a public stakeholder advisory committee for implementation oversight.
- 11. Adaptation Plan to be Phase 1 priority with schedule and budget with oversight by stakeholder advisory group. Since the drafting of the original Plan the need for adaptation has become more pronounced and preparing now could avoid future costs, yet the current draft contains no formal commitment to completing an adaptation plan. The final CAP should make a hard commitment to this



The Environmental and Economic Sustainability Task Force (EESTF) was established by the City Council in October 2010 as an independent advisory body to work with City staff on the development of the Climate Action Plan. We are grateful for the opportunity to provide comments on the draft July 2015 Draft CAP and EIR. If you have questions on this, please do not hesitate to contact me.

Sincerely,

Douglas Kot, Chair  
City of San Diego, Economic and Environmental Sustainability Task Force

Economic and Environmental Sustainability Task Force Members

Douglas Kot, Chair, District 3  
Diane Coombs, District 1

**Response to Comment U-7**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment U-8**

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment U-9**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment U-10**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment U-11**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment U-12**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Comment Letter U**

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Kristen Victor, District 2  
Nicola Hedge, District 4  
Doug Smith, District 5  
Bill Powers, District 6  
Kayla Race, District 8  
D. Bart Chadwick, Mayor's Office

Cc: Kevin Faulconer, Mayor  
Council President Sherri Lightner and Councilmembers  
Mike Hansen, Director of Land Use & Environmental Policy, Office of Mayor Faulconer  
Brian Schoenfisch, Senior Planner, Planning Department  
Cody Hooven, Sustainability Manager, Economic Development Department

LETTER

RESPONSE

**Comment Letter V**

**From:** [Dorothy Gesick](#)  
**To:** [DSD EAS](#)  
**Subject:** Comments re: SD Climate Action Plan SCH NO.2015021053  
**Date:** Tuesday, September 29, 2015 8:16:58 AM

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Attention : Rebecca Malone  
I urge the City of SD to adopt a strong Climate Action Plan.

Dorothy Gesick  
3720 Louisiana Street

I V-1

**Response to Comment V-1**

This comment does not address the adequacy of the Draft EIR. Comment noted.

LETTER

RESPONSE

Comment Letter W

**From:** [Catheryn Mullinger](#)  
**To:** [DSD EAS](#)  
**Subject:** Comments regarding San Diego Climate Action Plan, SCH NO: 2015021053  
**Date:** Tuesday, September 29, 2015 10:08:16 AM

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Attention: Rebecca Malone  
 I urge the City of San Diego to adopt a strong Climate Action Plan. We (and the world) have lost decades of precious time deferring action until there's no time left to save the basis of a quality life for ANY of us. The effort to achieve 100% clean energy by 2035 offers the potential of good-paying local jobs for the residents of San Diego, and in the process we can make our homes and community green, health, and efficient. We must create safe, clean, convenient, and affordable public transit, while also creating walkable, bikeable, and safe neighborhoods for ALL---part of this effort MUST be to give attention to those communities that have been most overburdened by air pollution, transportation inequity, and climate impacts. Please don't be diverted from DOING THE RIGHT THING by powerful special interest groups who, honestly, in the long run will thank you...their futures and those of their children and grandchildren depend on our taking action NOW.  
 Thank you,  
 Catheryn Mullinger

W-1

Response to Comment W-1

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter X

**From:** [Avrin, William](#)  
**To:** [DSD EAS](#)  
**Subject:** Comments regarding San Diego Climate Action Plan, SCH NO: 201502105  
**Date:** Tuesday, September 29, 2015 10:34:11 AM

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Attention: Rebecca Malone

I urge the City of San Diego to adopt a strong Climate Action Plan that achieves 100% renewable energy by 2035. Such a plan will promote good green jobs, insulate our region's economy from fluctuating fossil fuel prices, improve air quality and make the city a more attractive destination for the tourism that is such a big part of our city's economy.

The Climate Action Plan must encourage energy-efficient homes, make public transit a truly viable alternative to freeways, and make it easier and safer for people to walk and bike. It must also increase investment in poorer communities, who suffer the most from air pollution and lack of accessible transportation.

Sincerely,

William F. Avrin, Ph.D.

9598 Carroll Canyon Road #165  
 San Diego, CA 92126  
 858-549-9431  
 619-602-5898 (Mobile)

X-1



Response to Comment X-1

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter Y

Rebecca Malone, Associate Planner  
City of San Diego Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

September 29, 2105

Via email: DSDEAS@sandiego.gov

Re: San Diego Climate Action Plan Draft PEIR Comments – Project 2015021053

Dear Ms. Malone,

Please accept these comments on the City of San Diego’s Climate Action Plan (CAP) Draft Programmatic Environmental Impact Report (PEIR), on behalf of Climate Action Campaign (CAC). CAC is a watchdog organization dedicated to stopping climate change and protecting San Diego’s quality of life.

We support the CAP’s legally-binding greenhouse gas reduction targets— 15% below the baseline by 2020 and 49% by 2035. In committing to and meeting these targets, the City will be doing its part in helping the state meet its 2020, 2030, and 2050 targets and be a leading example of addressing climate change regionally, statewide, and nationally. While the most recent science suggests these goals may be insufficient to fully combat climate change, we agree these targets are an appropriate starting point for this first iteration of the City’s CAP.

We also fully support the CAP’s groundbreaking and necessary goals, including for 2035:

- 100% clean energy citywide
- 50% of commutes by transit, walking, and biking in priority areas
- 2 mile reduction in average vehicle commute distance
- 90% reduction in waste
- 35% urban tree canopy

Achieving these goals will not only help protect and preserve our future, but will also improve our quality of life and health today and drive technical and economic innovation and entrepreneurship to find climate solutions. These strategies will ensure San Diego is prepared to meet the needs of a 21<sup>st</sup> century economy and emerging workforce that wants clean air, clean energy and bicycling, walking, and transit as real and preferable transportation methods.

Our review of the draft PEIR, CAP, and technical appendices shows some additional and amended actions are needed to ensure the City and its residents are able to fully meet the CAP’s goals. Our recommendations can be summarized as the following:

1. Develop Budget and Year-1 Work Plan
2. Develop CAP Consistency Checklists for Community Plans
3. Strengthen CAP Consistency Checklist for CEQA Streamlining Review
4. Regional Transportation Planning and Funding—Leverage City Position at SANDAG
5. Plan for Adaptation to Climate Change
6. Integrate Language on Social Equity into Goals, Targets and Actions in Chapter 3

Y-1

Y-2

Response to Comment Y-1

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see Response to Comment N-3 regarding the CAP Consistency Checklist.

Response to Comment Y-2

Comment noted.

**Comment Letter Y**

We offer more detail on these six recommendations in our comments below.

1. Develop Budget and Year-1 Work Plan

Critical to ensure the Climate Action Plan results in tangible change and achieves real greenhouse gas reductions is allocating the proper funding. Developing an accurate budget may require creating more detailed work plan for the first year or two of implementation, which could be a companion document to the CAP to be presented shortly following the plan's adoption.

Budgeting needs in the CAP's first year should include, but are not limited to:

- Infrastructure and programs needed to implement the Bike and Pedestrian Master Plans. The share of transportation funds should minimally match the CAP's mode-share goals and be adjusted upward as necessary to achieve of the goals. We also support prioritizing these funds in disadvantaged areas identified by CalEnviroScreen.
- Clean Energy and Efficiency Installation on City-owned properties.
- Community Choice Aggregation Validation Study.
- Tree planting sufficient to implement the Urban Forest Management Plan and meet 2020 goals.
- Consultant and/or staffing for developing an Adaptation Plan.
- Sufficient staff funding to move the Zero Waste program forward to meet 2020 goals.
- Relevant City staff time and associated expenditures, including the Sustainability Manager, Urban Forest Manager, staff of the Departments of Transportation and Stormwater, Environmental Services, and Planning to implement and monitor CAP compliance.

Y-3

2. Develop CAP Consistency Checklists for Community Plans

Community Plans are a key tool for implementing the CAP—in governing whether our urban neighborhoods will be compact and transit-oriented, help people live close to where they work, provide safe pathways for pedestrians and bicyclists, are affordable to a diversity of incomes, have trees and parks to reduce heat and use energy and water wisely. In fact, the Mayor regularly touts Community Plan Updates as the key strategy for implementing City of Villages and CAP goals.

As multiple Community Plan Updates are currently in development, we are concerned the CAP includes no requirements or guidance for how these Updates should comply with and help achieve the CAP's goals. This must be a key priority before any new plans are adopted by Council. This is also important given the potential impacts the PEIR identifies to Land Use, Neighborhood Character, and Transportation and Circulation. The City must develop a CAP Consistency Checklist for Community Plans—a concept similar to the CAP Consistency Checklist for CEQA streamlining (Appendix A). Success metrics should include reduction of VMTs and improvement of air quality, rather than traditional Level of Service (LOS) as proposed in the PEIR (p3.F-15).

Y-4

3. Strengthen CAP Consistency Checklist for CEQA Streamlining Review

We support the purpose of CAP Appendix A, Climate Action Plan Consistency Checklist—to allow exceptionally environmentally sustainable projects to have faster review of the GHG portion of

Y-5

**Response to Comment Y-3**

Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment Y-4**

Please see Response to Comment N-3 regarding the CAP Consistency Checklist.

**Response to Comment Y-5**

Please see Response to Comment N-3 regarding the CAP Consistency Checklist.

Comment Letter Y

CEQA. However, the proposed requirements for fast-tracking projects, which were not publicly available during the Scoping period, appear very low and could hinder the CAP's and General Plan's goals. We offer the following recommendations to improve this apparent discrepancy.

Y-5

First, we believe Land Use and Transportation Checklist Part 1, Question 2 (whether a project is in a Transit Priority Area) should be a threshold, deal-breaker question, regardless of how energy or water efficient the project is. While some development may need to occur outside of Transit Priority Areas, it is essential to the CAP and reducing VMTs that the City prioritize development within those areas; development outside of those areas should not have the privilege of CEQA streamlining. A key metric in evaluating projects should be VMT reduction, rather than using LOS as proposed in in the PEIR (p3.F-15). We cannot afford more sprawl development.

Y-6

Second, we believe the Energy and Water criteria in Checklist Part 2 needs to be improved. Question 1's requirement that projects be 15% below "average" energy use is too low. State Title 24, Section 6 standards would be a more appropriate benchmark than "average". Even more appropriately, the Checklist should require Net Zero Energy. The City's General Plan Policy CE-A5 calls for all new development and major redevelopment to be net zero energy consumption by 2020 for residential and 2030 for commercial construction. We do not believe anything less than what the General Plan requires should not be given the privilege of CEQA streamlining.

Y-7

Further, Question 2 in Part 2 allows projects using 5% less water than average to be streamlined. With the new normal of living with drought, the City must do far more to conserve water for future generations. In addition to requiring far more efficient use of water in the Checklist, the City should also take other actions necessary to achieve State Water Board guidelines and the City's Water Task Force recommendation to reduce water use by 35% or more, such as codifying the current temporary drought conservation measures as permanent and establishing more specific targets, with a means to enforce. This should be included as a supporting measure in CAP Strategy 1.

Y-8

Finally, Checklist Part 3 should be eliminated; any project not meeting the Checklist Part 1 criteria should not have the privilege of CEQA streamlining and should undergo full CEQA review. We additionally ask the final CAP and PEIR to clarify how actions and projects after 2020 will be processed under CEQA, with regards to using the CAP and checklist for tiering.

Y-9

4. Region Transportation Planning and Funding—Leverage City Position at SANDAG

We fully support the CAP's groundbreaking and necessary goals for shifting the way people get to work—with 50% of commuters in Transit Priority Areas taking transit, walking, and biking by 2035. We believe this target to be achievable with the appropriate City and SANDAG expenditures, actions, and project and policy approvals. But, therein lies the challenge. As the City is part of a regional transportation network whose funding and planning is largely governed by SANDAG, it is essential the City work proactively to ensure SANDAG's plans support the CAP. Currently, that is not the case. CAC recently published a report<sup>1</sup> with Circulate San Diego using SANDAG's data to show the underinvestment and deprioritization of transit, walking, and biking in the draft Regional Transportation Plan undermines the City's ability to achieve CAP goals. SANDAG projects its

Y-10

<sup>1</sup> [http://circulatecsd.nationbuilder.com/new\\_climate\\_for\\_transportation](http://circulatecsd.nationbuilder.com/new_climate_for_transportation)

**Response to Comment Y-6**

Please see Response to Comment N-3 regarding the CAP Consistency Checklist. **Response to Comment Y-7**

Please see Response to Comment N-3 regarding the CAP Consistency Checklist.

**Response to Comment Y-8**

Please see Response to Comment N-3 regarding the CAP Consistency Checklist.

**Response to Comment Y-9**

Please see Response to Comment N-3 regarding the CAP Consistency Checklist.

**Response to Comment Y-10**

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Comment Letter Y

Regional Plan would put the City's Transit Priority Areas on a path to reach only 15% alternative transportation by 2035. That's even lower than the CAP's 2020 goal of 21%.

This is a significant hurdle the City must and can do more to address. Luckily, there is a solution. The City has two seats on the SANDAG board and can control 40% of the votes. While that's not all of the votes needed to decide any one outcome, the City has the influence needed to improve the Region's plans.

5. Plan for Adaptation to Climate Change in Stand-Alone Document by 2017

We support language in the CAP acknowledging the need for development of a stand-alone climate adaptation document. This should be a mandatory action item in Phase 1. The City has a critical need to assess the risks to the City's infrastructure, public health, safety, and natural resources, especially for sensitive and disadvantaged populations, and prioritize limited resources where they are most needed to reduce vulnerability and enhance capacity to adapt. Acting now will also reduce future costs. The Coastal Commission agrees, highlighting in its recently adopted Sea Level Rise guidance document: "The third National Climate Assessment notes that there is strong evidence showing that the cost of doing nothing to prepare for the impacts of sea level rise exceeds the costs associated with adapting to them by about 4 to 10 times (Moser et al. 2014)."

6. Integrate Language on Social Equity into Goals, Targets and Actions in Chapter 3

We support the City in having a special focus on ensuring disadvantaged communities benefit from this plan and are prepared to adapt to climate change. We support the goal in Chapter 4, Social Equity and Job Creation, to "Prioritize programs and actions to reduce emissions in disadvantaged communities that rank in the top 25 percent of CalEnviroScreen's ranking for San Diego region communities." (p51). We also join many stakeholders in recommending this goal be integrated throughout the strategies in Chapter 3, so it is not forgotten. This could help address air quality impacts the DEIR identifies for sensitive receptors. City staff informed us such prioritization may currently be done as an informal practice. Formalizing this prioritization by integrating it into the CAP would help keep the City accountable and transparent to the public in future years.

Thank you for the opportunity to submit these comments. With our recommendations included, we are eager to work with the City in moving forward with adopting and fully implementing this groundbreaking plan.

Sincerely,

Nicole Capretz  
Executive Director

Kayla Race  
Director of Operations and Programs

Y-10

Y-11

Y-12

**Response to Comment Y-11**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment Y-12**

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter Z

From: Carlos Cabezud  
To: DSD EAS  
Subject: Climate Action Plan  
Date: Tuesday, September 29, 2015 10:43:04 AM

To whom it may concern:

*I am writing to urge you, very strongly to:*

1. Support the CAP designed to reduce our overall carbon footprint in half by 2035;
2. Support local control of our energy future using Community Choice Energy;
3. Improve measures to enforce the City of Villages growth strategy;
4. Make stronger commitments to increase active transportation and transit infrastructure;
5. Come up with a concrete, precise outline for implementation; and
6. Make stronger commitments to future-proofing San Diego and ensuring the city is prepared for a much hotter, drier future with rising seas.

Z-1

I believe this is extremely important for the future of San Diego and for the kind of world we will leave behind for our children.

Sincerely,

Carlos F. Cabezud

Response to Comment Z-1

Comment noted.

Comment Letter AA



September 29, 2015

Rebecca Malone  
 Associate Planner  
 City of San Diego Planning Department  
 1222 First Avenue, MS 501  
 San Diego, CA 92101

**Re: San Diego Climate Action Plan, Project No. 2015021053: Comments To Draft Program Environmental Impact Report**

Dear Ms. Malone:

The San Diego Gas & Electric Company (SDG&E) is pleased to provide the following comments on the draft Program Environmental Impact Report (PEIR) on the City of San Diego's draft Climate Action Plan (CAP).

The following comments are being provided consistent with CEQA guidelines, "to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences.... in light of what is reasonably feasible." To the extent these comments address energy components of the Climate Action Plan; they are focused on the analysis and assumptions underlying these components of the Climate Action Plan and are applicable without regard to how energy procurement is or may be conducted in the future. SDG&E supports customer choice, and nothing herein is intended to take any position on the merits of Community Choice Aggregation or any other potential alternatives that may become available to customers.

**"Providing a roadmap to achieve GHG reductions"**

1. The Climate Action Plan and the PEIR contain insufficient data to corroborate the carbon reduction estimate of approximately 2,603,944 MT CO<sub>2</sub>e in carbon reduction from "Community Choice Aggregation or a Similar Program" by 2035. Neither the Climate Action Plan nor the PEIR includes *energy use* estimates and projections which are necessary to calculate and replicate the GHG reduction estimates that are the goals of the Climate Action Plan. The accuracy of the Estimated GHG Reduction Potential of Local Strategies in Table 3.1 of the Climate Action Plan (page 30), and repeated in Table 2-3 of the PEIR (page 2-16), cannot be established by the data provided in both documents and their appendices. The Climate Action Plan and the PEIR are

AA-1

**Response to Comment AA-1**

CAP Appendix A has been updated to include a more detailed methodology for how the GHG reduction from implementation of a CCA or another program was determined. Please see specifically CAP Appendix pages A-5 through A-10 for the methodology for CCA or another program. Greater detail has been provided for the forecasted GHG reductions for all of the CAP Actions.

Comment Letter AA

predicated upon the clear and correct GHG reduction targets. It is imperative that the math behind this target, and all other actions that impact electric usage, be transparent and readily available in order to provide a reliable Climate Action Plan roadmap for evaluation by San Diego's decision makers.

AA-1

- 2. In *Strategy 2.1: Clean and Renewable Energy*, neither the Climate Action Plan nor the PEIR appropriately separate the GHG reductions that would be achieved by State mandates alone in the absence of a Climate Action Plan, from those that are attributed to a "Community Choice Aggregator or a Similar Program" by 2035.

This is a critical data point that will enable decision makers to assess the City's actionable GHG reduction targets that correspond to a 100 percent renewable goal. The roadmap must have a correct GHG reduction target. Without clear identification of this actionable target, decision makers cannot properly plan nor assess the environmental effectiveness, costs, and social equity of the strategies, actions, and supporting measures to achieve the remaining actionable percentage of GHG carbon reductions after deducting reductions that will happen *on their own* under State mandates without action by the City.

As presented in the Climate Action Plan and PEIR, the GHG reductions listed as part of *Strategy 2.1: Clean and Renewable Energy* overstate the actual GHG reductions that would occur from a "Community Choice Aggregation Program or Another Program" and understate carbon reductions from State mandates by 2035. *Strategy 2.1: Clean and Renewable Energy* of Table 3.1 states that "Community Choice Aggregation Program or Another Program" will result in an approximate 2.6 million MT CO<sub>2</sub>e reduction by 2035. The GHG reductions attributed to "Community Choice Aggregation Program or Another Program" were determined by calculating the difference between the 2010 GHG baseline and zero GHG emissions associated with 100 percent renewable power, assuming the amount of energy that will be served under this program.<sup>1</sup> This calculation fails to account for much higher renewable content required under State mandates than that included in the 2010 baseline.

AA-2

The Climate Action Plan recognizes both the current 33 percent renewable portfolio standard (RPS) and the State's most recent direction to increase this percentage.<sup>2</sup> Senate Bill 350 recently approved by the Legislature would require 50 percent renewables by 2030. The Climate Action Plan assumes that the portfolio of those not choosing "Community Choice Aggregation Program or Another Program" for energy will be at least 60 percent renewable and assigns that corresponding GHG reduction to the California RPS. The Climate Action Plan states that extrapolating SDG&E's current renewable supply trend in complying with the state's renewable mandates would yield a renewable content of about 67%.<sup>3</sup> Yet, the GHG reduction from this

<sup>1</sup> The method used to calculate this value is explained in page B-25 of the Appendices.

<sup>2</sup> See page 21 for baseline RP assumption.

<sup>3</sup> See Appendices page B-6.

Response to Comment AA-2

Comment noted. Revisions to the CAP and CAP Appendix A separate out the emissions reductions associated with Community Choice Aggregation or another program that are attributable to the statewide Renewable Portfolio Standard. This change decreased the amount of reductions achieved at the local level, and increased the amount at the State level—the overall level of reductions remained the same.

Comment Letter AA

State RPS program is not deducted in the calculation for the energy associated with "Community Choice Aggregation Program or Another Program." The GHG intensity of City residents not choosing the "Community Choice Aggregation Program or Another Program" would be that of the SDG&E resource portfolio - approximately 262 lbs./MWh.<sup>4</sup> Thus, the GHG reductions achieved from moving from the 2010 baseline to 67% renewables in 2035, including GHG reductions from State mandates, would result in about 1.7 million MT CO<sub>2</sub>e in reductions, or about 65 percent of the entire reduction, attributable to State mandates. This 1.7 million MT CO<sub>2</sub>e is erroneously attributed to "Community Choice Aggregation Program or Another Program" in the Climate Action Plan and the PEIR.

AA-2

This portion of GHG reduction should be removed from the "Community Choice Aggregation Program or Another Program" line and moved to the State policy section in Table 3.1 of the Climate Action Plan and in the corresponding tables of the PEIR. This correction does not change the total reductions in the Climate Action Plan; it just correctly identifies the driving factor for these GHG reductions. Once corrected, this leaves 35 percent of the total (uncorroborated) 2.6 million MT CO<sub>2</sub>e in GHG reductions in *Strategy 2.1: Clean and Renewable Energy* for City decision makers to consider achieving under "Community Choice Aggregation Program or Another Program."

AA-3

- 3. The 100 percent renewable level is untested in the PEIR. A major element of the Climate Action Plan is to achieve an energy supply with near zero GHG emissions. This is a noble, bold, but untested strategy in terms of both cost and maintaining electric system reliability that the residents of San Diego have grown accustomed to and will continue to expect in the future. The City does not operate its own electrical grid and will be relying on the California Independent System Operator (CAISO) to balance supply and demand. The City needs to consider that not only them but other parties, including every electric supplier in the state, will be increasing the use of renewables to meet state mandates at a minimum. The Climate Action Plan assumes that the City can buy any mix of large-scale renewables that it wants, including using Renewable Energy Credits, and as long as at the end of the year the total renewable energy production equals total energy city use, then the Climate Action Plan has achieved its goal.

AA-4

This is far from achieving the goal stated on page 35 of the Climate Action Plan: "Achieving 100% renewable energy on the city-wide grid by 2035." In fact, whether buying actual large-scale renewable power, relying on new local distributed renewable power, or relying on virtual renewable power through RECs from any location (there is no stated limit that the City's purchases have to be in California), the Climate Action Plan would necessarily rely on the use of local natural gas-fired power

<sup>4</sup> See Appendices page B-24 for the assumption regarding SDG&E's portfolio in meeting the state's RPS mandate. The intensity was calculated assuming the non-renewable power was natural gas with an emission rate of 810 lbs./MWh.

Response to Comment AA-3

See Response to Comment AA-2. All GHG reductions attributable to State actions have been categorized as such in the CAP and the FEIR.

Response to Comment AA-4

As specified in the CAP, on page 35, the City will "[c]omplete a citywide Community Choice Aggregation Feasibility Study" as part of the implementation strategy for Action 2.1, which will consider these issues. Calculations are based on reasonable assumptions. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Comment Letter AA

plants to maintain grid stability, especially at peak usage hours in the evenings. Battery storage, deployed in unprecedented quantities and at great costs relative to natural gas-fired power plants, is a possible alternative. SDG&E is a leader in the deployment of battery storage and earlier this year achieved an unprecedented task, powering an entire community, Borrego Springs, for nine hours on renewable power and batteries alone. Neither the feasibility nor the grid impacts of new large-scale renewables projects and of small-scale renewable projects are analyzed in the PEIR. Neither peak natural gas requirements nor peak battery storage requirements needed to maintain the grid and reliable electric service when renewables are naturally unavailable are addressed in the PEIR.

AA-4

Natural gas is needed to provide grid reliability, as more and more intermittent renewable resources are integrated into the system. In just the last five years, natural gas has enabled SDG&E to increase the amount of renewable energy in its portfolio by more than 20 percent -- from 11 percent in 2010 to 33 percent today. In that same time period, SDG&E has eliminated coal and nuclear as contracted energy sources from its portfolio. Natural gas electric generation will remain an important resource for ensuring reliability for the San Diego region and beyond, even as more and more renewable resources and energy storage solutions are integrated. The PEIR does not address the necessary interaction of renewables and natural gas or the operational and environmental effects of this interaction. While the vast majority of the rest of the nation grapples with weaning itself off coal and transitioning to natural gas, SDG&E has no contracts for coal-based power and has pioneered the use of natural gas to support increasing percentages of renewables in its energy mix. A discussion on natural gas is a necessary part of a credible energy roadmap.

AA-5

The PEIR also does not address "the potential contribution of a large-scale pumped storage project toward meeting the City's renewable energy needs" mentioned in the Climate Action Plan (page 24). This potential "multi-year renewable energy project at the San Vicente Reservoir" would be in partnership with the San Diego County Water Authority. Under state law, large-scale hydroelectric pumped storage projects are not eligible for the renewable portfolio standard (Renewables Portfolio Standard Eligibility Commission Guidebook, California Energy Commission, May 2012, pages 19-28). Moreover, pumped storage uses water and gravity to store and dispatch energy. It does not generate energy, renewable or otherwise. Pumped storage relies on purchased energy to pump water from one basin to another in order to exploit price arbitrage opportunities in the pricing of electricity at different times of day. The carbon content of a pumped storage project's electricity is that of the energy used to pump water into a storage basin. State law notwithstanding, the purchased electricity to pump water into a storage basin would have to be 100 percent renewable for such a project to be considered a renewable storage project.

AA-6

Response to Comment AA-5

Natural gas is not a 100 percent renewable energy source, and thus, was not included specifically in the CAP strategies. CAP Appendix A includes natural gas, as it is an energy source currently in use.

Response to Comment AA-6

The CAP's reference to the "potential contribution of a large-scaled pumped storage project toward meeting the City's renewable energy needs" is in a list of examples of the "Growing Presence of Renewable Energy in San Diego." It describes a partnership between the City and the San Diego County Water Authority to conduct an in-depth study of the feasibility of a multi-year renewable energy project at San Vicente Reservoir. The CAP does not include any reductions attributable to this reference.

**Comment Letter AA**

At this point, neither the Climate Action Plan nor the PEIR have provided a roadmap or analyzed the feasibility of a roadmap to achieve 100 percent renewables. That roadmap to examine the feasibility of 100 percent renewables should use the same definition of renewables that is used for the State RPS so that a consistent standard is employed to measure incremental GHG emission reductions from the 2010 baseline that would occur under current and prospective state law and mandates.

AA-7

**“Conform to California Laws and Regulations”**

The Regulatory Sections of the PEIR do not account for Senate Bill 350 (DeLeon), the Clean Energy and Pollution Reduction Act of 2015. On September 11 of this year, the Legislature approved SB 350, which sets a 50 percent renewable requirement for retail sellers of electricity, set a goal to double the amount of energy efficiency savings in the state and mandates a review of energy efficiency rebates and incentives to achieve the goal, and states Legislative intent to support electric charging and natural gas infrastructure. This bill and several active applications at the California Public Utilities Commission are likely to change the amount of carbon reductions in both the electric sector, the natural gas sector, and the transportation sector that will result from state mandates. The carbon reduction and costs to achieve *Strategy 1: Water & Energy Efficiency in Buildings*, for example, are very likely to be affected by the mandated review and potential changes to rebates and incentives ordered by the California Energy Commission and the CPUC. Although the timing of SB 350 and ongoing and expected regulatory proceedings at the CPUC complicate inclusion in the PEIR, there is no doubt that these issues will affect, and potentially reduce significantly, the carbon reduction targets of the City beyond state mandates.

AA-8

**The CMAP Alternative**

The PEIR provides an “Alternatives” analysis within Chapter 8 (pages 8-1 to 8-14). This analysis compares the Project (Climate Action Plan) to both the No Project alternative and a previously developed plan that was not adopted, namely the 2012 Climate Mitigation and Adaptation Plan (CMAP).

The CMAP was the initial GHG reduction plan considered by the City that provided policy direction and identified actions that the City and community could take to reduce GHG emissions consistent with AB 32. The City released a draft of the CMAP in August, 2012, but the plan was never adopted. This Alternative would adopt and implement the 2012 Draft CMAP instead of the CAP. The CMAP Alternative establishes a planning horizon of 2013-2035 and includes the following: quantifies GHG emissions from community-at-large and City operations; establishes reduction targets for 2020, 2035 and 2050; identifies strategies and measures to reduce GHG levels, focusing on those that the City has authority to implement; and provides guidance for monitoring progress on an annual basis. In addition, the CMAP Alternative highlights climate change vulnerabilities, adaptation strategies, and recommendations for further research. The CMAP Alternative, similar to the proposed Project, focuses on four categories of GHG sources and associated reduction strategies:

AA-9

**Response to Comment AA-7**

The purpose of the CAP is to assess the policies and actions needed to reduce emissions to meet specified targets. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment AA-8**

Recent changes to legislation either remain consistent with current GHG estimates in the CAP or are anticipated to generate additional reductions. The CAP calculations assume a 50 percent level of renewable energy for 2030, consistent with SB 350. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting. Please also see Response to Comment U-5.

**Response to Comment AA-9**

The Draft EIR has been revised to reflect that the CMAP Alternative is the environmentally superior alternative in that it would eliminate or reduce the severity of impacts related to the implementation of large-scale renewable energy projects. The commenter is correct that local GHG emissions achieved under the CAP would be lower than those in the CMAP Alternative, but that overall reductions in the CAP would be greater than those shown in the CMAP because additional state and federal reductions are included in the CAP. The lower locally-achieved actions are due to rapidly changing federal and state regulatory environment. Where state and federal programs result in certain greenhouse gas emissions reductions, implementation of certain local measures become obsolete.

**Comment Letter AA**

The PEIR notes that “the CMAP Alternative would implement local programs that would achieve a projected reduction of about 1.6 million MT of CO<sub>2</sub>e below business as usual by 2020, and about 3.3 million MT by 2035.... However, the CAP projects much higher reductions from State and federal programs, such that the overall GHG reduction by 2035 is substantially higher than projected in the CMAP.” The PEIR concludes:

“[there is] little difference in severity of impacts between the Project and the alternatives. The No Project Alternative would have an additional significant impact related to GHGs, since it would not implement the policies regarding reduction of GHGs contained in the General Plan. The CMAP Alternative would have somewhat reduced impacts related to land use, but would not be as effective as the CAP in reducing GHG emissions.”

This last statement appears to be the result of the fact that State and federal GHG mandates that will result in future GHG reductions within the City were never incorporated into the CMAP. In any case the PEIR concludes that the Climate Action Plan is the environmentally superior alternative because both the No Project alternative and the CMAP alternative would have greater impacts related to GHGs than the proposed Climate Action Plan. The table below (which was not provided in the PEIR) indicates that the conclusion of the environmental superiority of the Climate Action Plan seems to be based on only one criteria – inclusion of future projected GHG reductions attributable to both state and federal programs. It is clear that the CMAP alternative would result in more substantial local GHG reductions by 2020 and comparable local GHG reductions by 2035.

**Projected GHG Reductions Resulting from Local Strategies – PEIR Alternatives**

Plan	Projected Local GHG Reductions (below baseline) by 2020 Target Year	Projected Local GHG Reductions (below baseline) by 2035 Target Year
CMAP	1.6 million MT CO <sub>2</sub> e	3.3 million MT CO <sub>2</sub> e
CAP	0.4 million MT CO <sub>2</sub> e	3.5 million MT CO <sub>2</sub> e

**The CMAP Alternative and Cost-Effectiveness**

Many of the associated costs for the CMAP alternatives are known. Appendix III of the CMAP – Cost Effectiveness Methodology Documentation - provides cost-effectiveness estimates for the proposed Electric, Natural Gas and Transportation measures outlined within the plan. The expected costs for each measure analyzed are represented in 2010 dollars per metric ton of carbon dioxide equivalent (\$2010/MT CO<sub>2</sub>e). Table 1 in Appendix III provides, at a glance, a high-level comparative analysis of those GHG reduction measures proposed in the CMAP that are most and least cost effective. This same level of cost effectiveness analysis is absent for the Climate Action Plan and the PEIR.

AA-9

AA-10

**Response to Comment AA-10**

This comment does not address the adequacy of the Draft EIR. Regarding the CMAP Alternative more generally, please see Response to Comment AA-9.

**Comment Letter AA**

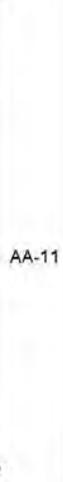
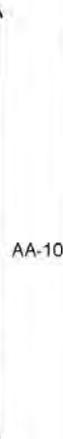
It is precisely the type of analysis that should be completed for all of the Climate Action Plan's proposed local GHG reduction measures (e.g., Strategies 1 through 5) to provide the City and its taxpaying residents with a clear, concise, and readily understandable map outlining the relative cost-effectiveness of each proposed strategy. The cost-effectiveness analysis would also provide a more rigorous baseline for determining the actual superiority of the Climate Action Plan relative to the No Project and CMAP alternatives, as outlined in the PEIR.

SDG&E strongly encourages the City of San Diego to complete a detailed analysis of the expected costs (in 2015 dollars) for each of the proposed local GHG reduction strategies prior to adopting the Climate Action Plan. The City has repeatedly stated that the Climate Action Plan, if adopted, will be reviewed annually without specifying what that review may include or what parameters it would be based upon. A thorough cost-effectiveness analysis, when completed, would provide a logical framework for annual review of each of the local GHG reduction strategies and their overall effectiveness in achieving the GHG reduction objectives outlined within the Climate Action Plan. The City has provided exactly this type of financial analysis with previous plans, so it is concerning that nothing has been provided to date for the Climate Action Plan.

**Transportation Alternatives**

The Transportation Strategy focuses on reducing emissions by reducing vehicle miles traveled (VMT) through multimodal transportation options, and by decreasing the energy intensity per miles travel by reducing idling and increasing electric vehicle use by improving the electric vehicle infrastructure.

In addition to its support for electric vehicles, SDG&E strongly believes that natural gas is a critical component of equitable and sustainable energy and climate action policies. Unfortunately, the PEIR does not include the role and benefits of natural gas in the transportation sector. Contrary to the discussion in the PEIR, natural gas is not just used for "generating electricity" and "heating homes and businesses" (Draft EIR page 3.G-7). Natural gas is relied upon every day by residents and businesses throughout the City of San Diego to cook food, heat water, operate fleets (e.g., transit buses, school buses, refuse trucks), do laundry, and for space heating. San Diego's leading institutions - the military, universities and colleges, hospitals, hotels, restaurants, and leading manufacturers - depend on natural gas for their energy needs. Unfortunately, both the draft Climate Action Plan and the PEIR fail to consider the vital role of natural gas in San Diego and the well documented potential environmental benefits of natural gas, particularly with respect to electric generation to reliably meet daily peak usage and in reducing emissions from petroleum-based heavy-duty transportation.



AA-10

AA-11

**Response to Comment AA-11**

See Response to Comment AA-5.

Comment Letter AA

Transportation accounts for nearly 44 percent of the region’s GHG emissions, 88 percent of the region’s SMOG, and 96 percent of the region’s diesel particulate matter emissions.<sup>5</sup> Between the U.S.-Mexico border, the Port, the region’s freeways, and a growing population, there can be no real “climate action” in the transportation sector without focusing on substituting natural gas for petroleum as a fuel source. Natural gas has 20 percent fewer emissions than diesel and 30 percent fewer GHG emissions than gasoline.<sup>6</sup> As noted by SANDAG, “[t]he state’s 2050 vision for heavy-duty vehicles foresees CNG, LNG, propane, biodiesel and hybrid technologies with the greatest potential for displacing petroleum-based fuels and improving efficiency.”<sup>7</sup>

Without question, natural gas can be used to displace petroleum-based fuels to reduce air quality impacts and reduce GHG emissions. The draft Climate Action Plan and PEIR fail to consider natural gas as a transportation alternative and as a fundamental energy source for San Diego.

**The Environmental Justice Alternative**

Although the PEIR identifies an Environmental Justice Alternative, it is eliminated from further analysis in part because some actions, such as the development of transit and other alternative transportation modes specifically to service environmental justice communities “are not under the jurisdiction of the City” and the Environmental Justice Alternative is “not substantially different from the CAP” (Draft EIR page 8-3). SDG&E agrees that the City does not have jurisdiction to implement many of the actions that would most effectively address climate change in a way that protects and benefits environmental justice communities, including low income communities and communities of color. But without analyzing the costs and benefits of the draft Climate Action Plan, the City cannot and should not assume that every citizen – including especially environmental justice communities – would not be adversely impacted.

**SDG&E Description Update**

The Introduction and Environmental Setting (1-11) and Utilities (3.G-7) sections of the PEIR contains outdated information on SDG&E. Today, SDG&E has 3.4 million consumers that are served through 1.4 million electric meters and 870,000 gas meters. The PEIR states, “SDG&E produces electricity primarily at the Cabrillo (Encina) and South Bay Power Plants.” The South Bay Power Plant, formerly owned by the Port of San Diego and operated by Dynegy, was retired from service on December 31, 2010, and imploded on February 2, 2013. The natural gas-fired Encina Power Station is owned by NRG Energy. It is not owned by SDG&E, therefore SDG&E does not produce power at that facility. SDG&E purchases electricity from the natural gas-fired Otay Mesa Energy Center owned by Calpine. SDG&E owns and operates the Palomar Energy Center in Escondido.

<sup>5</sup> California Air Resources Board (CARB), California GHG Emissions Inventory 2000-2012, released May 2014; CARB, 2013 Almanac; CARB, California Toxic Inventory 2010 (<http://www.arb.ca.gov/toxics/cti/cti.htm>).

<sup>6</sup> California Energy Commission, US Department of Energy.

<sup>7</sup> SANDAG Regional Energy Strategy, page 96.

AA-11

AA-12

AA-13

**Response to Comment AA-12**

As stated in Section 8, Alternatives, in addition to the lack of jurisdiction over transit projects, the environmental justice alternative was not selected because actions to improve conditions in environmental justice communities are already included in the General Plan, Housing Element, and CAP.

**Response to Comment AA-13**

The following text changes have been made:

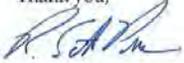
“SDG&E purchases raw energy supplies from various suppliers located outside of the city and transports those energy sources to local plants for processing. SDG&E purchases electricity from the Otay Mesa Energy Center, owned by Calpine, and SDG&E owns and operates the Palomar Energy Center in Escondido. ~~SDG&E produces electricity at the Cabrillo (Encina) and South Bay Power Plants, as well other smaller power plants in the San Diego area.~~ Once the energy is processed, it is sent to customers via SDG&E’s system of transmission lines.” (Introduction, page 1-11)

“...Gas and Electric Substations and Transmission Lines, identifies some of SDG&E’s facilities within the City. ~~SDG&E produces electricity primarily at the Cabrillo (Encina) and South Bay Power Plants, as well other smaller power plants~~ SDG&E purchases electricity from the Otay Mesa Energy Center, owned by Calpine, and SDG&E owns and operates the Palomar Energy Center in Escondido, which is then sent to customers through various transmission lines.” (Section 3.G Utilities, Page 3.G-7)

**Comment Letter AA**

SDG&E looks forward to helping the City of San Diego develop its Climate Action Plan and achieve San Diego's environmental goals in the most effective and cost-effective way possible.

Thank you,



R. Scott Pearson  
Director  
Environmental Services

**Comment Letter AB**

**From:** [Colleen Dietzel](#)  
**To:** [DSD EAS](#)  
**Subject:** Comments regarding San Diego Climate Action Plan, SCH NO: 2015021053  
**Date:** Tuesday, September 29, 2015 1:46:18 PM

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Attention: Rebecca Malone,

I urge the City of San Diego to adopt a strong, legally binding Climate Action Plan that achieves 100% renewable energy by 2035 and prioritizes clean energy jobs, public transit options and energy efficiency measures in urban, impacted neighborhoods.  
Thanks for your consideration on this urgent matter.

AB-1

Colleen Dietzel  
4423 Brighton Ave.  
San Diego, California 92107  
619-225-1083

**Response to Comment AB-1**

Comment noted.



**CHAIRMAN**  
David Poole  
Brookfield Residential

**VICE CHAIRMAN**  
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Lennar Homes

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Chelsea Investment Corp.

**PRESIDENT & C.E.O.**  
Borre Winckel

**AFFILIATES**  
California Building Industry Association  
National Association of Home Builders

**Comment Letter AC**

September 29, 2015

Rebecca Malone  
Associate Planner  
City of San Diego  
202 C Street  
San Diego, CA 92101

RE: Building Industry Association of San Diego County response to the DRAFT Climate Action Plan.

Dear Rebecca,

The Building Industry Association of San Diego County is comprised of 700 member companies and a workforce of over 60,000 men and women. We have reviewed the Draft Climate Action Plan and offer the following comments and recommendations.

The California home building industry has been doing its part to reduce Green House Gas emissions by creating the most efficient homes in the nation – if not the world. A recent study of energy efficiency by *ConSol*, a Stockton-based energy consulting firm, shows just how well new homes perform. The *ConSol* analysis, backed by data from the *California Air Resources Board* and the *California Energy Commission*, reveals how the use of increasingly efficient components and systems as well as improved design and construction has produced California homes that far out-distance any others in the nation when it comes to energy savings.

As a result, today's newly constructed California homes have a "carbon footprint" that is already 25% smaller than those built in 1990. That means substantially less impact on the environment and substantial energy savings. When compared with the national code used in most states, California's energy code is approximately 50% more stringent with additional requirements set to take effect in 2017. *Consider that if all homes in the U.S. were built like those today in California, the country would be compliant with the much-heralded Kyoto global-warming protocol of 1998.*

AC-1

**Building Industry Association of San Diego County**  
3201 Spectrum Center Blvd., Suite 110, San Diego, CA 92123-1407  
P 858-450-1221 F 858-552-1445 www.biasandiego.org

**Response to Comment AC-1**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Comment Letter AC**

New homes make up only one-half of one percent of San Diego's total housing stock. In fact San Diego is home to 600,000 houses built *prior* to the establishment of stringent state energy regulations. Upgrading an existing home is over nine times more cost effective than trying to squeeze more energy savings from an already efficient newly built home.

The city's best option of addressing GHG emissions is to improve the existing housing stock. *For example, a \$5,000 investment in energy improvements reduces GHG emissions by 33% in existing homes.* The state also recognizes the value of improving existing housing stock with the passage of Senate Bill 350 that mandates a 50% reduction in energy use in existing buildings by 2030.

Any specific design requirements included as part of the implementation of the City's Climate Action Plan should be fully vetted by knowledgeable professionals in the building industry to eliminate any requirements that are redundant with existing requirements promulgated by the State, such as those included in the *California Building Energy Efficiency Standards (Title 24, Part 6)* and the *California Green Building Standards Code (Title 24, Part 11)*. Redundancies may at first appear to be of only secondary concern, but additional regulations that add an unnecessary layer of time and attention to the extensive bureaucratic process already in place will increase costs and therefore reduce the affordability of housing even more.

For example, the 2013 residential energy efficiency standards (Title-24) are already well over 20% more rigorous than the 2008 standards, which became building code in 2010. These standards are recognized by all California jurisdictions as the correct method for defining the energy efficiency of any building, regardless of its size or number of bedrooms.

The 'Consistency Checklist' in Appendix A of the CAP references an arbitrary 7,101 kWh/yr per unit and requires that projects demonstrate a 15% or 25% reduction from that. This measure is not consistent with already existing Title-24 code, and is actually incorrect because it does not take into consideration the size of the building like Title-24 does.

Therefore, the 7,101 kWh measure is oversimplified because it does not reflect actual design parameters like building size, and adds a layer of unnecessary regulation that Title-24 already addresses.

Clarification is requested on portions of the CAP Consistency Checklist listed on pages 5 – 11 in the Appendices:

*Checklist Part 1: Is the proposed project consistent with the existing land use designations in the General Plan, the applicable Community Plan, the Bicycle Master Plan, and the Municipal Code? (emphasis added)*

AC-1

AC-2

AC-3

**Response to Comment AC-2**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment AC-3**

Please see Response to Comment N-3.

Comment Letter AC

Concern arises in the area of Community Plan consistency whereby a submitted project in a yet to be updated community plan may be in keeping with the intent of the CAP in terms of density and TOD but may be negatively impacted due to its inconsistency with outdated community plan. We recognize that the city is aggressively pursuing community plan updates and request that some accommodation be made for projects that could fall into the aforementioned circumstance.

*Checklist Part 2: Does the residential project reduce energy use by 15% below average residential energy consumption value per unit? (emphasis added)*

As stated in previous text, new homes are far more energy efficient than existing housing stock created prior to 1990. The lion's share of energy savings is best achieved through upgrades to existing housing stock rather than additional energy restriction on the .5% of new energy efficient homes. Is the 2010 baseline of 7,101 kWh/yr per unit reflective of both new and existing housing stock or is it exclusive to new home construction? Since energy use is predominately determined by the number of occupants which vary from unit to unit, what matrix is used to determine the energy efficiency of units?

*Checklist Part 2: Waste Diversion: Does the project achieve 75% waste diversion? (emphasis added)*

Does the 75% diversion requirement apply to construction and demolition waste or does it apply to the project occupants once completed and if so, how is this to be determined and monitored? Also, diversion requirements in Checklist Part 3 mandates a 91% waste diversion for the entire project. How and why was a 91% mandate determined?

*Checklist Part 3: Tree Canopy: Does the project site achieve 25% urban tree canopy cover trees? (emphasis added).*

Please define the area which is subject to the 25% tree canopy requirement. Is it 25% of the development footprint or landscaping? It is determine by the ultimate growth of the tree or at the time of planting. Also, please explain the inherent conflict between the water reduction requirement and the requirement to provide a greater tree canopy ratio which requires water.

These comments are not meant to be exhaustive, but rather, examples of some of our more noteworthy concerns resulting from our review. In conclusion, while we support and applaud all reasonable and cost effective means to care for the San Diego environment and promote sustainable communities, we are most concerned with avoiding costly and ineffective means that result in undue burdens on the building industry and new home buyers. San Diego is home to some of the highest home prices in the nation and according



AC-3

AC-4

Response to Comment AC-4

Comment noted. Please also see Response to Comment N-3.

Comment Letter AC

to a study by *Point Loma Nazarene University*, the city's regulatory process is responsible for over 47% of new home construction costs.

↑ AC-4  
↓

We ask that you strive to strike a reasonable balance during the fine-tuning of the Climate Action Plan. We look forward to your consideration of our comments and to our continuing participation in the CAP refinement process.

Sincerely,

  
Matthew J. Adams  
Vice President

brc:mja

Comment Letter AD



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Rebecca Malone, Associate Planner  
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1222 First Ave, MS 501  
San Diego, CA 92101  
Via email: [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov)

September 29, 2015

Re: San Diego Climate Action Plan Draft PEIR

Dear Ms. Malone,

Thank you for the opportunity to provide input on the City of San Diego's Climate Action Plan (CAP) Draft Programmatic Environmental Impact Report (PEIR). Since our founding in 1980, Environmental Health Coalition (EHC) has been committed to fighting toxic pollution and protecting San Diego's health, environment, and quality of life. Climate change threatens all San Diegans' right to live in healthy and resilient communities, but it impacts some neighborhoods more than others. **The City should act now to reduce carbon pollution and address the disproportionate risks faced by the most impacted neighborhoods. The City should protect and invest first in neighborhoods impacted first by climate change.**

While we support the legally binding greenhouse gas reduction targets and most top-line goals in the draft Climate Action Plan through 2035, our analysis of the July 2015 Draft CAP Draft PEIR finds the CAP does not utilize all feasible measures to mitigate the significant impacts identified in the DEIR, impacts including:

- Transportation and land use strategies allowing toxic air quality in disadvantaged communities;
- Large scale energy facilities resulting in impacts to air quality, water resources, visual and neighborhood character and incompatibility with General Plan policies to "use small, decentralized, and appropriately-sited energy efficient power" (CE-I.12) and "maximize energy efficiency" (CE-I.2); (the CAP's energy disclosure strategy only achieves 5% of the energy conservation target); and
- Incompatibility with General Plan policies to "protect public health, safety and welfare equitably and address the needs of the disenfranchised" (LU-I.3) and "prioritize and allocate citywide resources to provide public facilities and services ...where greater needs exist." (LU-I.4).

Additional measures and changes are needed to fully mitigate the impacts that could result from the plan and ensure compliance with state laws, the City's General Plan, and City Council Resolution R-2015-68. Our comments offer recommendations for additional mitigation measures in the following major areas:

1. **Transportation and Land Use:** Prioritize disadvantaged neighborhoods first and strengthen commitment to implementing active transportation infrastructure, regional transit investment, and affordable, transit-oriented housing with buffers. While we support the goal in CAP Chapter 4, Social Equity and Job Creation, to "Prioritize programs and actions to reduce emissions in disadvantaged communities that rank in the top 25 percent of CalEnviroScreen's ranking for San Diego region communities," this goal should not be isolated to Chapter 4. It should be fully integrated throughout the programs and actions described in Chapter 3, to improve transparency and clarity.

AD-1

**EMPOWERING PEOPLE. ORGANIZING COMMUNITIES. ACHIEVING JUSTICE.**  
**EMPODERANDO A LA GENTE. ORGANIZANDO A LAS COMUNIDADES. LOGRANDO LA JUSTICIA.**

Response to Comment AD-1

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter AD

2. **Energy efficiency and renewable energy:** Require energy efficiency standards that maximize reduction of energy use in existing and new buildings, particularly to benefit low-income rental units, and prioritize local, in-basin renewable energy resources in disadvantaged neighborhoods. Efficiency requirements may be met through participation in a state, federal, or utility funded energy efficiency programs. The City must facilitate greatly increased participation in order to meet the CAP's efficiency goals. Additionally, the CAP should give greater weight and enforceability to the comment for Action 2.1, which says "Efforts should be local in nature to benefit local renewable energy business, create jobs, and increase resiliency for the City" (CAP Chapter 3, p.35) and these local efforts should include both local solar PV and mandatory energy efficiency and conservation.

AD-2

Citywide actions necessitate a system for prioritizing implementation and utilizing limited resources in an orderly, transparent, and effective way. We presume the City does not have the resources to immediately implement and achieve the entirety of citywide measures such as investment in pedestrian and bicycling facilities to achieve 7% walking commutes and 18% biking commutes. The City must find somewhere to start in working towards those goals. We suggest the starting place be environmental justice communities who rank in the top 25% of regional CalEnviroScreen scores and are also within transit priority areas.

AD-3

EHC recommended these concepts as an "Environmental Justice Alternative" in our Scoping Comments. We urge the City to integrate these recommendations in the final PEIR and Climate Action Plan, in order to avoid many of the significant impacts the DEIR states are "unavoidable" and in order to ensure the Climate Action Plan is equitable, comprehensive, and enforceable and that San Diego's working families can be resilient in a changing climate.

AD-4

Response to Comment AD-2

Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Response to Comment AD-3

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Response to Comment AD-4

The purpose of the CAP is to provide a roadmap to achieve specified GHG reductions. Strategies in the CAP would involve activities to reduce energy consumption, increase renewable energy generation, reduce vehicle use and vehicle miles traveled, increase alternative fuel vehicle use, and increase solid waste vehicle fuel efficiency. These activities would have a beneficial effect on air quality by reducing the use of sources of air pollution and improving ambient air quality citywide, which is inclusive of the environmental justice communities. Please also see Draft EIR Section 8.C. Also, the Environmental Justice Alternative would not include any features that would reduce the significance of the impacts that would result from implementation of the CAP.

**Comment Letter AD**

CAP ENVIRONMENTAL JUSTICE ALTERNATIVE SCENARIO RECOMMENDATION  
RECOMMENDED MODIFICATIONS TO JULY 2014 DRAFT

**STRATEGY 1: ENERGY AND WATER EFFICIENT BUILDING**

**Action 1.1 (Efficiency in Existing Homes):** Present to City Council for consideration a residential Energy Conservation and Disclosure Ordinance that requires:

- ✓ All homes disclose energy use and benchmarking scores. Reports to homeowners should include cost and benefit analysis of efficiency options and available incentives and financing options.
- ✓ Inefficient homes implement efficiency improvements within a set period of time, such as through participation in a federal, state, or utility funded energy efficiency program.

Ordinance may be phased in by buildings size, age, energy use, or energy performance, and requirements may be triggered at specific dates, at points of transaction, or at other major events for buildings.

**Supporting Measure (Financing) (p35):** Pursue additional financial resources and incentives, including but not limited to funds from the California Greenhouse Gas Reduction Fund, ratepayer funds via a Regional Energy Network or SDG&E Local Government Partnership, and U.S. Housing and Urban Development and Department of Energy grants, for local programs to assist low and moderate income households and businesses with implementing energy and water efficiency measures identified by the conservation and disclosure ordinances, and to promote the expansion of greywater systems.

**Target 1.3** Reduce energy consumption at municipal facilities by 15% by 2020 and an additional 50% by 2035.

**Action 1.3 (Efficiency in Municipal Buildings):** Present to City Council for consideration a Municipal Energy Strategy and Implementation Plan that prioritizes efficiency and renewable energy upgrades on properties in census tracts ranking in the top 25% of CalEnviroScreen scores in the County.

**NEW Action and Target for Existing Nonresidential and Multifamily Buildings:**

**Target:** Reduce energy consumption in nonresidential buildings by 50% by 2035

**Action:** Present to City Council for consideration a Nonresidential and Multifamily Energy Conservation and Disclosure Ordinance that requires:

- ✓ Annual benchmarking and disclosure of ratings (such as with EPA Portfolio Manager) for all nonresidential buildings and multifamily buildings (4+ units). Reports to building owners should include cost and benefit analysis of efficiency options and available incentives and financing options.
- ✓ Inefficient buildings implement efficiency improvements within a set period of time.
- ✓ Create a resident assistance program for low income residents, with the following goals:
  - Educate and support renters and homeowners to access available incentives.
  - Ensure that assistance is provided to 5,000 low income families annually.
  - Ensure that 6,300 low income residences are retrofitted by 2020.

**Comment Letter AD**

**NEW Action and Target for New Buildings (Residential and Nonresidential):** Present to City Council for consideration an ordinance to require achievement of net zero energy consumption in new residential and non-residential construction, via efficiency and installation of onsite renewable energy.

**STRATEGY 2: CLEAN AND RENEWABLE ENERGY**

**Action 2.1 (Renewable Energy Citywide):** Present to City Council for consideration a Community Choice Aggregation (CCA) that increases renewable energy supply on the electrical grid to achieve the 100% renewable energy target and prioritizes efficiency and local, distributed generation resources in disadvantaged communities and good-paying jobs for local residents.

**STRATEGY 3: BICYCLING, WALKING, TRANSIT, AND LAND USE:**

**Transit Priority Areas Rankings, Supporting Measure (p39):** Develop new priority ranking for planning and funding infrastructure improvements and maintenance that support achieving CAP transit, pedestrian, and bicycling goals in Transit Priority Areas, using the following prioritization order:

1. Areas that meet both of the city's criteria for a transit priority area (Meets the Public Resources Code § 21099 (a)(7) definition AND is in a census tract in the City that ranks in the top 25% of CalEPA's CalEnviroScreen scores within the County.
  - a. Areas identified as high risk for pedestrian and bicycling collisions should be the highest priority within these communities.
2. Census tracts in the City that rank in the top 25% of CalEPA's CalEnviroScreen scores within the County.
3. Meets the Public Resources Code § 21099( a)(7) definition of a transit priority area.

This priority ranking system shall be integrated into the Capital Improvement Priority Matrix (Policy 800-14), for mobility assets and shall apply to all eligible sources of capital improvements funds, including but not limited to, revenue generated by TransNet, Community Development Block Grant opportunities and Public Facilities Financing Plans, as well as any General Fund revenue allocated to the capital improvement program budget.

This priority ranking system shall also commit City funds for biking, walking, and transit supporting infrastructure in an amount sufficient to ensure the CAP's mode-share goals are met or exceeded. The share of funds should at a minimum match CAP's mode-share goals and be adjusted upward periodically to ensure achievement of the goals.

**Action 3.1 (Transit):** Implement the General Plan's Mobility Element and the City of Villages Strategy in Transit Priority Areas to increase the use of transit, prioritizing implementation in census tracts in the City ranking in the top 25% of CalEPA's CalEnviroScreen scores within the County.

**Action 3.2 (Walking):** Implement pedestrian improvements in Transit Priority Areas to increase commuter walking opportunities, prioritizing implementation in census tracts ranking in the top 25% of CalEPA's CalEnviroScreen scores within the County and are at high risk for collisions between pedestrians and motor vehicles.

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**Comment Letter AD**

**Action 3.3 (Bicycling):** Implement the City of San Diego's Bicycle Master Plan to increase commuter bicycling opportunities, prioritizing implementation in census tracts ranking in the top 25% of CalEPA's CalEnviroScreen scores within the County and are at high risk for collisions between bicycles and motor vehicles.

**Action 3.4 and 3.5 (Traffic Efficiency):** Implement a Traffic Signal Master Plan (Action 3.4) and a Roundabouts Master Plan (Action 3.5) to reduce vehicle fuel consumption and improve safety and mobility, prioritizing corridors that have the highest pedestrian collision rates and are in census tracts ranking in the top 25% of CalEPA's CalEnviroScreen scores within the City.

**New Supporting Measure:** The City of San Diego's two voting representatives on the SANDAG Board shall vote and take other decision-making actions at SANDAG that are consistent with the CAP goals, the SANDAG Urban Area Transit Strategy (UATS) goals for regional and city transit connectivity, and City Resolution R-2011-966 goals, which direct:

1. That the RTP prioritize public transportation and mass transit projects and minimize the expansion of single-vehicle general purpose highway lanes.
2. That the RTP advance the timeline of funding for key commute routes, improving transit frequency, and active transportation projects.
3. That the RTP provide greater clarity about how greenhouse gas emissions Development reduction targets are being met in the long term, specifically how the aims of SB375 will be met through the life of the Plan out to 2050.
4. That the Sustainable Communities Strategy consider implementing concepts such as "Safe Routes to Transit" programs, prioritizing a "Transit First" system of projects, and ensuring that a Transit-Oriented strategy is developed to link mass transit with affordable housing development.

**Action 3.6 (Transit-Oriented Development):** Implement equitable transit-oriented development within Transit Priority Areas, including significant development of affordable residential housing with appropriate safety precautions. Commit to meeting the following TOD principles and goals:

- ✓ **INCLUSIONARY HOUSING/ZONING:** Significantly increase affordable housing units near transit stops and jobs. At least 50% of all housing developed or redeveloped as a consequence of any transit-oriented development should be protected to ensure that it remains permanently affordable. Furthermore, structure regulations so transit-oriented development enables anyone who wants to remain in the community to do so. New housing should be sited with appropriate buffers (300-500 feet) from freeways or high-traffic roads (roads with more than 100,000 vehicles per day) and including health design features such as air filters and sound walls.
- ✓ **NO NET LOSS:** Commit to "no net loss" of residents and local businesses with a multifaceted strategy that could include efforts to preserve existing affordable housing, help renters become owners before prices rise, and efforts to support local businesses.
- ✓ **PROVIDE OPPORTUNITY TRANSIT PASSES:** Provide opportunity transit passes for residents in the new housing development so they are able to access transit services.
- ✓ **LIVING WAGE JOBS:** Develop a strategy to create and promote living wage jobs near TOD locations.

**Comment Letter AD**

- ✓ **CULTURAL AND SOCIAL SERVICES ACCESS:** Prioritize affordable commercial space in TOD and surrounding areas for community centers, cultural centers, service providers and culturally relevant businesses.
- ✓ **REDUCE PARKING REQUIREMENTS:** Explore reducing parking requirements in TOD areas and accompany with transportation demand management strategies such as the development of a fund that supports free transit passes.
- ✓ **AUTHENTIC PUBLIC PARTICIPATION:** Include communities of color who are stakeholders in TOD planning and policy to be part of decision-making. Participation should go beyond legal mandates and provide appropriate languages to meaningfully engage.
- ✓ **ENSURE COMMUNITY BENEFIT:** Ensure TOD provides measurable community benefit, including connections to productive employment opportunities, access to public amenities, and an increase in local affordable housing. Support and promote the use of stakeholder-led agreements with developers, such as Community Benefits Agreements and Community Workforce Agreements.

**STRATEGY 5: CLIMATE RESILIENCY**

**Action 5.1** Present to City Council for consideration a city-wide Urban Tree Planting and Urban Parks Program that prioritize implementation in census tracts ranking in the top 25% of CalEPA's CalEnviroScreen scores within the County and are underserved.

**New Action** Commit to completing a full climate adaptation plan by 2017 to identify and address the greatest risks to our infrastructure, environment, and public health, especially in the City's most vulnerable communities.

Comment Letter AD

EHC Comments on July 2015 Draft Environmental Impact Report, Climate Action Plan

SUMMARY: Analysis and Mitigation of Air Quality and Equity Impacts on Sensitive Receptors and Environmental Justice Communities—CAP Fails to Consider All Feasible Mitigations

The CAP DEIR notes that Air Quality impacts of the CAP would be "Significant and Unavoidable," even after the proposed mitigations, because there could be "air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations" (DEIR, ES-7). The DEIR fails to consider all feasible mitigations to address this impact and it further fails to acknowledge that such unmitigated impacts would also mean that the CAP would conflict with General Plan policy LU-I.3 to "protect public health, safety and welfare equitably...and address the needs of the disenfranchised." Currently the DEIR claims the CAP would not conflict with the General Plan (DEIR 3A-21).

The DEIR additionally notes there could be significant impacts from the construction of large scale energy facilities, but fails to consider all available mitigation options in coming to its conclusion these impacts are "unavoidable."

As noted above, we agree certain CAP actions have the potential to expose sensitive receptors to substantial pollutant concentrations as well as impose other impacts to neighborhood character; however we disagree these are "unavoidable" impacts. As we noted in our Scoping Comments and as we note throughout our comments now on the CAP DEIR, there are many things the City can and should do as a part of the CAP to avoid and mitigate harmful impacts to sensitive receptors, including people living in environmental justice communities identified as Census tracts ranking in the top 25% of CalEPA's CalEnviroScreen scores within the County, while maximizing benefits to these communities.

We support the goal in CAP Chapter 4, Social Equity and Job Creation, to "Prioritize programs and actions to reduce emissions in disadvantaged communities that rank in the top 25 percent of CalEnviroScreen's ranking for San Diego region communities" (CAP, Chapter 4, Social Equity and Job Creation, p51). However, this goal should not be isolated to only Chapter 4; it should be fully integrated throughout the programs and actions described in Chapter 3, to improve transparency and clarity.

We also support the CAP's comment in Action 2.1, related to the implementation of 100% renewable energy, that "Efforts should be local in nature to benefit local renewable energy business, create jobs, and increase resiliency for the City" (CAP Chapter 3, p.35). However, this side comment should be embraced with more weight and enforceability, and include mandatory energy efficiency and conservation among the local energy strategies.

EHC and dozens of others recommended these concepts as an "Environmental Justice Alternative" in Scoping Comments, which the DEIR briefly acknowledges but then quickly and inappropriately dismisses (DEIR 8-3). We dispute the DEIR's rebuttal that, because some actions are citywide or in the General Plan, an Environmental Justice Alternative is unnecessary. To the contrary, actions that are citywide necessitate a system for prioritizing implementation in order to create an orderly, transparent, and effective process for utilizing limited resources; we presume the City does not have the resources to immediately implement and achieve the entirety of citywide measures such as investment in pedestrian and bicycling facilities to achieve 7% walking commutes and 18% biking commutes. The City must find

AD-5

AD-6

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Response to Comment AD-5

The Draft EIR concluded that air quality impacts would be significant and unavoidable at the program level due to the uncertainty air quality impacts that would occur with implementation of CAP Action 2.1. Nevertheless, Mitigation Measure AIR-1 is provided to mitigate potential air quality impacts to the extent feasible. Regarding consistency with the General Plan, a project "need not be in perfect conformity with each and every [general plan] policy" since "no project [can] completely satisfy every policy stated in [a general plan]." *Sequoyah Hills Homeowners Ass'n v. City of Oakland*, 23 Cal. App. 4th 704, 719 (1993). Moreover, while implementation of certain projects under the CAP may result in adverse air quality impacts, implementation of the CAP as a whole would result in overall increased air quality as a result of reduced greenhouse gas emissions, which would be consistent with General Plan Policy LU-I.3 providing for the "protect[ion] [of] public health, safety and welfare equitably . . ." and to "address the needs of the disenfranchised."

Response to Comment AD-6

Please see Response to Comment AD-4. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

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somewhere to start in that process. We suggest the starting place be environmental justice communities who rank in the top 25% of regional CalEnviroScreen scores and are also within the transit priority areas.

Therefore, we urge the City to revisit and approve the Environmental Justice alternative to avoid many of the impacts the DEIR claims are "unavoidable." This concept and other mitigations are included throughout our comments on the DEIR and in our updated alternative at the end of these comments.

AD-6

STRATEGY 3, BICYCLING, WALKING, TRANSIT, & LAND USE

We agree with the conclusion in the DEIR's Transportation and Circulation Section F that the CAP would be consistent with the intent of City and regional plans that seek to improve local and regional transportation and we strongly support the targets to achieve 50% of commuter mode share via bicycling, walking, and transit by 2035 (Targets 3.1-3.3).

However, we also agree with other conclusions in the DEIR's Air Quality Section C and Transportation and Circulation Section F there are some inherent air quality and safety risks -- which are mitigable -- associated with transit-oriented development and active transportation, particularly for sensitive receptors and disadvantaged populations. There are additional potential impacts to Neighborhood Character, which could occur as a result of certain land use and transportation actions, which are not adequately analyzed or mitigated. Certain measures can and should be taken to avoid and mitigate such impacts, which we further describe below.

AD-7

A. Safety Impacts and Mitigations for Sensitive Receptors and Disadvantaged Populations (STRATEGY 3, ALL ACTIONS)

RECOMMENDATIONS:

- ✓ Include in Actions 3.2 and 3.3, related to funding and permitting projects that improve bicycling and pedestrian infrastructure and transit access, prioritize neighborhoods that rank in the top 25% of CalEnviroScreen scores in the County and are within the CAP's Transit Priority Areas. Further prioritize corridors identified as high risk for pedestrian and bicycling collisions.
- ✓ Include a supporting measure for Actions 3.1, 3.2, 3.3, and 3.5 to commit City funds to improve bicycling and pedestrian infrastructure citywide and access to transit, prioritizing top ranking CalEnviroScreen communities. The amount of funds should be sufficient to ensure the CAP's mode-share goals are met or exceeded and the share of funds should at a minimum match CAP's mode-share goals and be adjusted upward periodically to ensure achievement of the goals.
- ✓ Commit City support for a Regional Transportation Plan that funds transit and active transportation projects *before* freeways.

AD-8

AD-9

REASONS:

The DEIR's Transportation and Circulation Section notes that Actions 3.1 through 3.6 may result in "increased conflict between transportation modes, such as bicycle vs motor vehicle and mass transit vs pedestrian, potentially resulting in adverse impacts to traffic flow and increased safety issues" (DEIR 3.F-

AD-10

\* Environmental Health Coalition comment letter on SD Climate Action Plan DEIR

Response to Comment AD-7

Impacts to neighborhood character are addressed in Section 3.B of the Draft EIR. As stated in the EIR, most of the proposed CAP actions do not have the potential to result in substantial visual incompatibilities with existing landscapes. Impacts from implementation of the City of Villages strategy have already been analyzed in the General Plan EIR. However, the development of large-scale renewable energy facilities within the City limits, which may result from implementation of CAP Action 2.1, could result in such incompatibilities. This could result in a significant impact to visual quality and neighborhood character, which is discussed in the Draft EIR.

Response to Comment AD-8

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Response to Comment AD-9

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Response to Comment AD-10

Please see Response to Comment AD-11.

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15). We concur with this assessment but we also conclude such impacts are mitigable with our recommendations below.

AD-10

Residents of low-income neighborhoods— which make up about around 1/3 of the Transit-Priority Area acreage— face significantly higher collision rates between vehicles and pedestrians or bicyclists than does the average San Diegoan. In fact, the City’s 2014 Comprehensive Pedestrian Safety Study finds that residents in low-income neighborhoods are ten times more likely to be hit by a car as pedestrian residents living in more affluent neighborhoods.<sup>1</sup> This disparity must be addressed.

AD-11

We support CAP Action 3.2 “Implement pedestrian improvements in Transit Priority Areas to increase commuter walking opportunities” and Action 3.3 “Implement the City of San Diego’s Bicycle Master plan to increase commuter bicycling opportunities”, as well as Supporting Measures to “Identify and address gaps in City’s pedestrian network and opportunities for improved pedestrian crossings, using the City’s Pedestrian Master Plan and the City’s sidewalk assessment” (CAP p.39) and implement infrastructure improvements including “complete streets” to facilitate alternative transportation modes for all travel trips” (CAP p.39). However, the CAP should go further to prioritize active transportation infrastructure in areas that are high-risk for collisions and also face high rates of pollution, low-income, and other social factors identified by CalEnviroScreen.

AD-12

Additionally, the measures above are moot if the City does not commit significant monetary investment in safe and robust bicycling, walking, and complete streets infrastructure where it is needed the most (CAP Actions 3.2, 3.3, and supporting measures). We support Strategy 3’s Supporting Measure to “Develop a new priority ranking for infrastructure improvements in Transit Priority Areas that will be integrated into Capital Improvement Priority Matrix, Community Development Block Grant opportunities and Public Facilities Financing Plans” but we also recommend that this new ranking system additionally include CalEnviroScreen as an additional screening layer, in order to improve equity and mitigate potential conflict between transportation modes. The City should additionally revisit Policy 800-14 to improve transparency of the CIP process, how projects get on the list, how they are scored, and how they are ultimately selected. Improved transparency will allow the City and public to assess what additional changes, if any, are necessary to ensure equity and environmental justice.

AD-13

Finally, if SANDAG does not also implement a transit-first regional transportation strategy that prioritizes significant and immediate funding for alternative transportation, there could still be safety and collision risks for sensitive receptors, as well as air quality impacts from additional roadway and highway construction and operations. Additional mitigations are needed in the CAP to ensure the City’s commitment to facilitating a transit-first regional plan.

AD-14

Additional mitigation is also needed to ensure the CAP’s consistency with the General Plan, which requires the City to “make transit planning an integral component of long range planning documents and the development review process” (ME-B.9) and “Provide adequate capacity and reduce congestion for all modes of transportation on the street and freeway system. (f) Evaluate RTP proposals for new or redesigned streets and freeways on the basis of demonstrated need and consistency with General Plan policies and community plan facility recommendations.” (ME-C-2) Again, the CAP should ensure the City’s commitment to facilitating the implementation and resources needed for a regional transportation plan that puts transit first.

AD-15

<sup>1</sup> Citywide Pedestrian Collision Analysis: City of San Diego Comprehensive Pedestrian Safety Study Revised 4/28/2014. <http://www.sandiego.gov/tsw/pdf/pedestriansafetystudy/pedcollisionanalysis.pdf>

**Response to Comment AD-11**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment AD-12**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment AD-13**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment AD-14**

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment AD-15**

Regarding General Plan consistency, please see Response to Comment AD-5.

Comment Letter AD

B. Toxic Air Emissions Risk Mitigations for Sensitive Receptors and Disadvantaged Populations related to Transit-Oriented Development (ACTIONS 3.1 & 3.6)

RECOMMENDATIONS:

- ✓ Establish an exclusion zone a minimum of 300-500 feet from a freeway or high-traffic road (roads with more than 100,000 vehicles per day) so that residential density would not be allowed to be increased in this zone for any reason.
- ✓ Require High Efficiency Particle Filters on all new residential buildings;
- ✓ Place sound walls and vegetation between the roadway and the sensitive receptors;
- ✓ Locate building air intakes on the side of the building away from the freeway or roadway;
- ✓ Design buildings to minimize generation of indoor air pollutants (no wood burning fireplaces, no gas appliances, vented stoves, building materials and furnishings with minimum potential to offgas).
- ✓ Commit City support for a Regional Transportation Plan that funds transit and active transportation projects *before* freeways.
- ✓ Include a supporting measure for Actions 3.1, 3.2, 3.3, and 3.5 to commit City funds to improve bicycling and pedestrian infrastructure citywide and access to transit, prioritizing top 25% ranking CalEnviroScreen communities. The amount of funds should be sufficient to ensure the CAP's mode-share goals are met or exceeded and the share of funds should at a minimum match CAP's mode-share goals and be adjusted upward periodically to ensure achievement of the goals.

REASONS:

We support the encouragement of transit-oriented development in order to facilitate increased use of transit, walking, and biking, so long as certain measures are taken to avoid unintended health risks and displacement of low-income residents (see next section for discussion of displacement). We recognize that, if implemented without precautionary measures, Action 3.1 "Implement General Plan Mobility Element and City of Villages Strategy in Transit Priority Areas" and Action 3.6 "Implement Transit-Oriented Development within Transit Priority Areas" have the potential of creating localized pollution hot spots and exposure of sensitive receptors to nearby pollution sources, as stated in the PEIR (3.C-19).

The PEIR does not include any mitigations for this impact because, as stated, "...the City of Villages strategy is already City policy, and because it was already the subject of environmental review (the General Plan PEIR), potential impacts associated with implementation of the City of Villages have already been addressed in the General Plan PEIR." (3.C-23) However, the General Plan PEIR does not address the hazards of exposure of sensitive receptors to nearby freeways, major roads, or other sources of toxic air emissions or traffic related pollutants. Whereas the Health and Safety section of the General Plan PEIR does reference the City's collocation policy as a source of mitigations for exposure of sensitive receptors to industrial hazardous materials, the potential for exposure to toxic air emissions, including traffic pollutants such as diesel exhaust and benzene, is not analyzed or mitigated in that document or in the present EIR. Extensive new evidence has been published on the health hazards of near-roadway pollution exposure since the General Plan PEIR was completed in 2002. Much of this research has been done in southern California and is thus highly relevant to understanding potential health hazards of in-fill development near freeways in San Diego. As an example, a 2012 study concluded that a full 8% of childhood asthma cases in Los Angeles are attributable, at least in part, to residence within 75 meters (about 250 feet) from a major road. Contrary to previously held assumptions about respiratory disease and

AD-16

Response to Comment AD-16

Please see CAP Chapter 4. Also, the City's General Plan recognizes the importance of addressing environmental justice through equal access to and meaningful participation in the decision-making process and the need to ensure the equitable distribution of public facilities and services. The General Plan includes policies to pursue environmental justice in the planning process through greater community participation, to prioritize and allocate citywide resources to provide public facilities and services to communities in need, and to improve mobility options and accessibility for the non-driving elderly, disabled, low-income, and other members of the population.

To implement the General Plan and provide an equitable distribution of public facilities, infrastructure, and services, the City developed Council Policy 800-14 which sets the City's priorities for the City's Capital Improvements Program (CIP). The policy prioritizes projects in under-served communities including those with low income households, low community engagement and low mobility or access to transportation systems based on SANDAG census tract. The policy also prioritizes projects located in areas eligible for the Community Development Block Grant funds, and projects located within a half-mile of affordable housing.

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting. Regarding General Plan consistency, please see Response to Comment AD-5.

**Comment Letter AD**

air pollution, these researchers find that roadway pollution causes some new cases of asthma, in addition to triggering existing asthma.<sup>2</sup>

Further, while the CAP (3.A-19) and General Plan LU-A.5 note that further environmental review and focused study will be conducted during community plan update processes to determine if locations are appropriate for mixed-use development and village design, we suggest that the CAP should be clearer and offer additional mitigations to minimize potential health, air quality, and displacement impacts while still facilitating transit-oriented development to achieve CAP Strategy 3. EIRs “must be written early enough so that whatever information is contained can practically serve as an input into the decision making process.” (*RiverWatch v. Olivenhain Municipal Water Dist.* (2009) 170 Cal.App.4th 1186, 1207 quoting *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 77, fn. 5).

Finally, even if the City adopts our recommendations for mitigations with respect to building and siting transit-oriented and affordable development, if the City does not also implement significant investment in safe and robust bicycling, walking, and complete streets infrastructure where it is needed the most (CAP Actions 3.2, 3.3, and supporting measure) and—as noted in the prior section—if SANDAG does not implement a transit-first regional transportation strategy that prioritizes significant and immediate funding for alternative transportation, then there could still be air quality impacts for sensitive receptors from additional roadway and highway construction and operation.

**C. Neighborhood Character: Displacement Risks and Mitigations for Disadvantaged Populations related to Transit-Oriented Development (ACTIONS 3.1 & 3.6)**

**RECOMMENDATIONS:**

- ✓ **INCLUSIONARY HOUSING/ZONING:** Commit to significantly increase affordable housing units near transit stops and jobs to reduce vehicle miles travelled and increase equity, while using an appropriate buffer and siting to avoid exposing affordable housing residents to excess air pollution levels and other hazardous material. At least fifty percent of all housing developed or redeveloped as a consequence of any transit oriented development should be protected to ensure that it remains permanently affordable. Furthermore, local regulation should be structured so transit oriented development enables anyone who wants to remain in the community to do so.<sup>3</sup>
- ✓ **INCENTIVE-BASED ZONING:** Incentive-based zoning can reward developers with density bonuses or floor-area bonuses if they meet affordable housing counts.<sup>4</sup>
- ✓ **NO NET LOSS:** The strategies to accomplish the goal of “no net loss” of residents and local businesses should be pursued. A multifaceted strategy could include efforts to preserve existing

<sup>2</sup> Pérez L, Lurmann F, Wilson J et al., 2012. Near Roadway Pollution and Childhood Asthma: Implications for Developing “Win-Win” Compact Urban Development and Clean Vehicle Strategies. *Environmental Health Perspectives*, Vol 120, Issue 11, November 2012. *Environ Health Perspect*; DOI:10.1289/ehp.1104785.

<sup>3</sup> Building the Line to Equity: Six Steps for Achieving Equitable Transit Oriented Development in Massachusetts <http://www.reconnectingamerica.org/assets/Uploads/2006BuildingTheLineToEquity.pdf>

<sup>4</sup> *Mixed-Income Housing Near Transit One* in a series of best practices guidebooks from The Center for Transit-Oriented Development *Increasing Affordability With Location Efficiency* <http://www.reconnectingamerica.org/assets/Uploads/091030ra201mixe-housefinal.pdf>

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AD-17

**Response to Comment AD-17**

Proposed CAP Action 3.1 Implement General Plan Mobility Element and City of Villages Strategy in Transit Priority Areas, and Action 3.6 Implement Transit-Oriented Development within Transit Priority Areas would result in the development of more dense, built-up, and transit and alternative transportation-oriented development, particularly within the TPAs. Since there is little remaining vacant land in the City available for development, implementation of the City of Villages strategy would largely occur through infill and redevelopment occurring in selected built areas. Impacts to Visual Effects and Neighborhood Character are analyzed in Draft EIR Section 3.b. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

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affordable housing, help renters become owners before prices rise, and efforts to support local businesses.<sup>5</sup>

- ✓ **TRANSIT PASSES:** Often times, people who are in need of affordable housing are also in need of affordable transportation options. Provide opportunity transit passes for residents in the new housing development so that they are able to access transit services. This type of program is currently being done in Los Angeles. In MacArthur Park, residents of the new housing development are even given a monthly METRO pass (a subsidy that both the housing developers and METRO help allocate).<sup>6</sup> Each household gets one monthly free pass on transit and residents pay \$20 (when the true market cost is \$70 for the pass). This public transportation pass voucher has been able to help housing developers receive state tax credits.
- ✓ **LIVING WAGE JOBS:** Traditional market-based and conventional TOD planning primarily focuses on housing and often ignores job quality. In TOD areas, low-wage service sector jobs are increasing more than living wage jobs. A strategy for living wage jobs near TOD locations needs to be included.
- ✓ **CULTURAL AND SOCIAL SERVICES ACCESS:** Community-serving institutions and businesses are needed to stabilize existing low-income communities of color as gentrification occurs.<sup>7</sup> Therefore, affordable commercial space should be prioritized in TOD and surrounding areas for community centers, cultural centers, service providers and culturally relevant businesses. A good example of this, the Fruitvale Village in Oakland, has a health care facility, a childcare center, a public library, a senior center, and a charter high school. While the MacArthur Park TOD does not have any of these social services, they are located in the neighborhood within walking distance of the TOD.<sup>8</sup>
- ✓ **REDUCE PARKING REQUIREMENTS:** Reducing parking requirements can increase the feasibility of mixed-income and mixed-use TOD because parking is expensive. Parking influences the development budget and is a key factor in determining housing prices.<sup>9</sup> Reducing parking requirements can be addressed with transportation demand management strategies such as, developing a Transit Pass Fund, which supports transit passes for residents living in Affordable Housing.
- ✓ **AUTHENTIC PUBLIC PARTICIPATION:** Include communities of color who are stakeholders in TOD planning and policy to be part of decision-making. Mechanisms for authentic public participation need to be incorporated into TOD projects, especially those where there are gentrification risks. This participation needs to go beyond what is legally mandated and also go

AD-17

<sup>5</sup> Building the Line to Equity: Six Steps for Achieving Equitable Transit Oriented Development in Massachusetts <http://www.reconnectingamerica.org/assets/Uploads/2006BuildingTheLineToEquity.pdf>

<sup>6</sup> Sandoval, Gerardo and Roanel Herrera. TRANSIT-ORIENTED DEVELOPMENT AND EQUITY IN LATINO NEIGHBORHOODS: A COMPARATIVE CASE STUDY OF MACARTHUR PARK (LOS ANGELES) AND FRUITVALE (OAKLAND). National Institute for Transportation and Communities (NITC), April 2015. <http://blog.enterprisecommunity.com/2012/05/field-notesequitable-transit-oriented-development>

<sup>7</sup> Sandoval, Gerardo and Roanel Herrera, April 2015.

<sup>8</sup> *Mixed-Income Housing Near Transit* One in a series of best practices guidebooks from The Center for Transit-Oriented Development Increasing Affordability With Location Efficiency <http://www.reconnectingamerica.org/assets/Uploads/091030ra201mixedhousefinal.pdf>

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beyond inauthentic forms of public engagement so that decisions that have already been made by transportation planners are not the driving force behind large-scale transportation projects.<sup>10</sup>

- ✓ ENSURE COMMUNITY BENEFIT: Since TOD utilizes public investment or regulatory relief, it should provide measurable community benefit, including connections to productive employment opportunities, access to public amenities, and an increase in local affordable housing.<sup>11</sup> Local governments and elected officials should support and promote the use of stakeholder-led agreements with developers, such as Community Benefits Agreements and Community Workforce Agreements.

REASONS:

The DEIR's analysis and mitigation of the Neighborhood Character impacts of CAP Actions 3.1 and 3.6 is incomplete. Although the DEIR identifies that Actions 3.1 and 3.6 may result in impacts to Neighborhood Character that "could alter or block scenic views, create new sources of light or glare, or result in changes to or incompatibilities with existing neighborhood character" (DEIR 3.B-21), the DEIR fails to acknowledge that a major contributor to neighborhood character is the people who live in the neighborhood, and there may be potential displacement of current low-income and disadvantaged residents as a result of CAP Actions 3.1 and 3.6.

The addition of market-rate homes to create Transit-Oriented Development can drive up rents of surrounding homes and therefore may cause economic displacement of residents living in a low-income area. Further, lower-income residents are often not able to afford the transit and cultural or retail opportunities that accompany transit-oriented development, which can also lead to displacement and isolation. To avoid these neighborhood character and equity impacts, it is necessary commit to our above recommendations for affordable housing, transit access, and other community benefits.

We support the encouragement of transit-oriented development as long as the development is envisioned by the impacted residents, with goals to facilitate increased use of transit, walking, and biking, and as long as measures are taken in order to mitigate and avoid such displacement, which can impact the neighborhood character.

D. GHG Impacts of New and Significant Redevelopment: Transportation-Related Mitigations Needed in CEQA Checklist, Appendix A

RECOMMENDATIONS:

- ✓ The Checklist should require the mitigations we recommend in the prior two sections for appropriate buffers for residential projects, affordability of residential projects, air filters, sound walls, and maximized indoor air quality, as well as investment in active transportation infrastructure in the vicinity.

REASONS:

CAP Appendix A "Consistency Checklist" Part I for Land Use and Transportation measures for new, large developments does not sufficiently mitigate the potential air quality, safety, and equity impacts identified in the above two sections of our comments. Checklist Part I currently proposes that projects should be simply consistent with the existing land use designations in the General Plan, the applicable

AD-17

AD-18

Response to Comment AD-18

Please see Response to Comment N-3.

<sup>10</sup> Sandoval, Gerardo and Roanel Herrera, April 2015.

<sup>11</sup> Building the Line to Equity: Six Steps for Achieving Equitable Transit Oriented Development in Massachusetts <http://www.reconnectinamerica.org/assets/Uploads/2006BuildingTheLineToEquity.pdf>

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Community Plan, the Bicycle Master Plan, and the Municipal Code, and be located in a transit priority area, which is insufficient.

↑ AD-18

**STRATEGY 2: CLEAN AND RENEWABLE ENERGY**

**A. Action 2.1 Renewable Energy: Impacts and Mitigations for Air Quality, Land Use and Visual and Neighborhood Resources**

**RECOMMENDATIONS:**

- ✓ Establish a policies for the achievement of Action 2.1 and the 100% clean energy target to:
  - Facilitate solar installation in neighborhoods who are most impacted by climate change
  - Commit to the state’s energy loading order of conservation, efficiency, and in-basin, rooftop distributed generation for renewable energy on rooftops, parking lots, and ground-mounted systems, before other energy procurement
  - Policies to divert biomass for green waste recycling and use for landscaping mulches to reduce evapotranspiration rates of landscaping plants, thereby saving water.
  - Facilitate the creation of good jobs for local residents

**REASONS:**

We strongly support target 2.1 to achieve 100% clean energy citywide by 2035 and believe this to be an achievable target if implemented properly, as demonstrated in other jurisdictions. However, we also acknowledge that if adequate mitigation measures are not implemented, CAP Action 2.1, Community Choice Aggregation Program may result in development of large-scale renewable energy facilities that could have multiple kinds of significant impacts. However, we disagree with the DEIR’s conclusion that the potential impacts to Visual Effects and Neighborhood Character are unavoidable. To the contrary, there are additional mitigations available that were not considered by the DEIR, such as prioritizing local in-basin solar and energy efficiency before large scale energy facilities. This mitigation should be included in the CAP to avoid this impact.

AD-19

One of the impacts identified by the DEIR stems from the potential construction of combustion (biomass, biogas) facilities that would be considered stationary sources, and which may therefore result in significant operational air emissions. Biomass burning is the least environmentally preferable of the renewable energy options, yet the DEIR provides no mitigations to address the potential air quality impact of development of biomass or other large scale energy facilities beyond whatever conditions are attached to air permits for stationary biomass or biogas facilities. To the contrary, additional Mitigation can and should be included in the CAP to avoid this impact.

Additionally, construction of other large-scale renewable facilities that may be located remotely or far away from San Diego could lead to emissions and other neighborhood and visual impacts during construction and operation of the facilities and associated transmission and distribution infrastructure. As noted in the DEIR, such facilities may also use large amounts of water—a resource that uses energy to transport and distribute and is becoming scarcer as climate change impacts become more pronounced. While the DEIR attempts to mitigate potential conflicts with Land Use and Visual and Neighborhood Resources by proposing Mitigation Measure LU-1 to develop appropriate siting guidelines and it attempts

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**Response to Comment AD-19**

As addressed in Chapter 3.A, Land Use, of the Draft EIR, future land use changes and any large-scale renewable energy projects proposed to implement the CAP would undergo further CEQA analysis to identify project-specific impacts, to identify feasible mitigation measures, and to consider alternatives, and to provide for public review and comment, prior to approval of any plan or project. Through the CEQA process, the compatibility of surrounding land uses and applicability of all land use plans would be reviewed to determine land use impacts that would result from a particular project, once sufficient details are available to provide for meaningful environmental review.

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to avoid excessive water use with Mitigation Measure WS-1, more can and should be done to avoid these impacts.

We support the note in the July 2015 CAP regarding Action 2.1 that "Efforts should be local in nature to benefit local renewable energy business, create jobs, and increase resiliency for the City" (CAP Chapter 3, p.35). As the DEIR acknowledges, "Small-scale renewable energy systems, such as residential and small commercial roof-top solar photovoltaic (PV), generally result in minimal environmental impacts" (DEIR 3.A-18). EHC recommends further codifying this concept as a DEIR mitigation measure and in the CAP Actions, in order to add accountability to this mitigation of potential Air Quality, Land Use, and Visual and Neighborhood impacts of large-scale renewable energy--particularly biomass or biogas—as well as comply with General Plan Policy CE-L.12 to "Use small, decentralized, and appropriately sited energy efficient power."

AD-19

B. Actions 2.2 and 2.3 Municipal Vehicles: Impacts and Mitigations AIR-1 and AIR-2

RECOMMENDATIONS:

- ✓ Action 2.3's target should be: 100% conversion from diesel fuel used by municipal solid waste collection trucks-- including privately-owned trucks contracted or permitted by the City to zero emissions (electric) or near-zero emissions (hybrid electric) trucks by 2035.

REASONS:

We support CAP Action 2.2 (increase municipal zero emissions vehicles to 50% by 2020 and 90% by 2035) and the concept of 2.3 (municipal alternative fuel policy to convert 100% of municipal waste collection truck to low emissions fuels by 2035). However, we recommend Action 2.3 should commit to zero emissions (electric) or near-zero emissions trucks (electric hybrid), rather than natural gas, which still has tailpipe emissions in addition to larger lifecycle emissions with sourcing, distribution, and leakage of the gas. Medium size heavy-duty trucks are now a viable, commercially available option and Class 8 fully electric trucks are being piloted at the Ports of San Diego, L.A., and Long Beach and are near commercial availability, including from San Diego County-based company Transpower. Battery electric trucks are already commercially available for lighter classes of trucks, such as delivery trucks.

AD-20

RECOMMENDATIONS:

Mitigations AIR-1 and AIR-2 be amended to include the following

- ✓ The City shall seek funding for implementation of pilot scale electric or hybrid electric vehicles, if these are not yet commercially available.
- ✓ The City shall require an increasing percentage of construction and collection vehicle fleets to be electric or hybrid electric vehicles, as these become commercially available.

AD-21

REASONS:

The DEIR mitigations for construction equipment (AIR-1) and collection vehicles (AIR-2) assume that these will continue to be fossil-fueled vehicles—gasoline or natural gas—which is inconsistent with Action 2.2 and our above recommendations for Action 2.3.

Response to Comment AD-20

This comment does not address the adequacy of the Draft EIR. Comment noted.

Response to Comment AD-21

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Comment Letter AD

STRATEGY 1: ENERGY AND WATER EFFICIENT BUILDINGS

A. Overview of Impacts and Mitigations for Strategy 1

Energy efficiency is a cost-effective and plentiful energy resource that should be utilized as the first step in achieving the 100% renewable energy target of CAP Strategy 2. We support the CAP Strategy 1's inclusion of energy efficiency targets for residential (Target 1.1) and municipal (Target 1.2). However, the actions described in the CAP Appendix and DEIR are insufficient to actually meet those targets, and therefore additional mandatory action must be included, which we further describe below. In addition, we urge the City to adopt goals and actions in the CAP for nonresidential building energy consumption, which make up a significant portion of building energy demand in San Diego. We also urge the City to take a stronger "Lead By Example" approach to efficiency and solar with its own facilities (Action 1.2). Finally we recommend additional analysis, data correction, and mitigation for water conservation (Actions 1.3-1.5).

Maximizing efficiency in all sectors is necessary to help mitigate some of the potential air quality, land use, neighborhood, and water impacts the DEIR describes could result from large-scale renewable energy installations that may be built to meet the CAP's 100% renewable energy goal.

Maximizing efficiency is also necessary for the CAP to be consistent with General Plan polices to:

- "Coordinate City energy planning programs with federal, state, and regional agencies. *Maximize energy efficiency*, use of clean renewable resources, and demand response." (CE-I.2)
- "Pursue investments in energy efficiency and direct sustained efforts towards *eliminating inefficient energy use*." (CE-I.7)
- Implement development policies to protect public health, safety and welfare equitably among all segments of the population and address the needs of the disenfranchised" (LU-I.3).

Further, maximizing energy efficiency opportunities for low-income households—who are disproportionately vulnerable to a higher energy cost burden and to living in older, less efficient, homes with poor indoor air quality—is necessary for the City to meet the CAP's equity goals and comply with General Plan policy to "Implement development policies to protect public health, safety and welfare equitably among all segments of the population and address the needs of the disenfranchised" (LU-I.3).

B. Action and Target 1.1 (Residential Building Energy Use)

RECOMMENDATION:

EHC recommends the EIR include the following mitigations to be included in Strategy 1, which may be phased in over time:

- ✓ Apply Energy Conservation and Disclosure Ordinance (Action 1.1) to all residential units, whether they are owner-occupied or renter-occupied, single-family or multifamily, at whatever trigger point is ultimately chosen for the ordinance (Appendix B and the DEIR assume point of sale, though other options are available and worthy of examination).<sup>12</sup> Ordinance should include:

<sup>12</sup> Alternatively, multifamily buildings could be addressed in a separate Commercial and Multifamily Building Benchmarking, Disclosure, and Conservation Ordinance, as the tools to address benchmark and upgrade commercial and multifamily buildings are generally more similar than those used to address single-family homes.

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AD-22

AD-23

Response to Comment AD-22

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting. Regarding General Plan consistency, please see Response to Comment AD-5.

Response to Comment AD-23

This comment does not address the adequacy of the Draft EIR. Comment noted. Regarding commercial building benchmarking and disclosure, please see Response to Comment K-3. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Comment Letter AD**

- ✓ Mandatory energy assessments and disclosure of assessments.
- ✓ Mandatory efficiency improvements for inefficient/low-performing buildings, as identified by the energy benchmarking scores, including through participation in a federal, state, or utility funded energy efficiency program.
- ✓ Significantly increase the City’s outreach and education for landlords and tenants about energy efficiency opportunities and funding opportunities, starting with the most inefficient buildings as identified by the energy benchmarking scores.
- ✓ Expand access to financing and funding, with a priority for facilitating improvements in low-moderate income properties (similar to an existing Supporting Measure for Strategy 1, but more focused)
- ✓ Create a resident assistance program for low income residents, with the following goals:
  - Educate and support renters and homeowners to access available incentives.
  - Ensure that assistance is provided to 5,000 low income families annually.
  - Ensure that 6,300 low income residences are retrofitted by 2020.

AD-23

**REASON:**

We support the inclusion of residential efficiency targets and a residential Energy Conservation and Disclosure Ordinance (Action 1.1) as the first step in a menu of options to reduce energy demand and achieve 100% renewable energy. However, the “Conservation” component of the “Energy Conservation and Disclosure Ordinance” is virtually nonexistent in the ordinance described in CAP Appendix B. In fact, the DEIR fails to analyze or mitigate the fact that Action 1.1 would completely fail to meet CAP Target 1.1. Whereas CAP Target 1.1 is to “Reduce Energy use by 15% per unit in 20% of residential housing units by 2020 in 50% of units by 2035,” the *actual result* projected by CAP Appendix B is that energy will be reduced in only 1.1% of residential units by 2020 and in only 2.85% of units by 2035. Looked at another way, the CAP Appendix B projects the Ordinance for Action 1.1 will only achieve about 5% of what the CAP aims to achieve. This is especially concerning given that the targets are low to begin with— far lower than the state’s target set in 2011 to reduce energy use in all existing homes by 40% by 2020.<sup>13</sup>

AD-24

- This failure is due to the inappropriate assumptions made in Appendix B that the ordinance would:
- only apply to *owner-occupied* units at point-of-sale or remodel, prematurely eliminating about half of residential units from eligibility; and
  - not require actual efficiency improvements, instead only requiring disclosure of energy use.<sup>14</sup>

<sup>13</sup> California’s Long-Term Energy Efficiency Strategic Plan, CPUC, Jan 2011

<sup>14</sup> The inadequacy of the ordinance is due CAP Appendix B inappropriately assuming:

(a) The ordinance would apply only to owner-occupied units and would not apply to units occupied by renters (Appendix B-13), which prematurely eliminates about half of residential units from eligibility.

(b) Energy disclosure would be required at the Point of Sale or remodel, which, based on the annual number of sales and remodels, would reach 19% of *owner-occupied* units by 2020 and 48% of *owner-occupied* units by 2035— about half of the reach of Target 1.1 (which is for all residential units).

(c) No efficiency improvements would be required and, therefore, only an estimated 12% of the owner-occupied units who must disclose their energy use under the ordinance would actually reduce energy use (Appendix B-15, pdf p29).

**Response to Comment AD-24**

The target for CAP Action 1.1 is to reduce energy use by 15% per unit in 20% of residential housing units by 2020 and 50% of units by 2035. The methodology outlined on pages A-14 through A-16 in CAP Appendix A provides for an estimate of the GHG reductions that Action 1.1 would be expected to achieve. Since the Energy Conservation, Benchmarking, and Disclosure Ordinance has not been prepared, the exact requirements for the ordinance are unknown. Therefore, the CAP assumes a basic amount of GHG reductions that could be attributable to the action. In CAP Appendix A, it is explained that rented units were not included in the calculations because it was assumed that landlords would be unlikely to improve efficiency for units where renters pay the energy costs.

The Energy Conservation, Benchmarking, and Disclosure Ordinance may include rental units, but the CAP Appendix A did not make this assumption to ensure that forecasted GHG reductions were not overstated. If the ordinance includes measures not assumed in the CAP, the City will amend the CAP accordingly. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting.

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- The above descriptions of Action 1.1 ordinance would disproportionately leave out low-income households, who are far more likely than the average San Diegan to:
- o Rent rather than own their home (69% renters versus 31% owners in SDG&E territory), which is problematic as many landlords are:
    - Unaware<sup>15</sup> of the many funding programs providing free and subsidized upgrades<sup>16</sup>
    - Hesitant to permit renters to participate in free energy upgrade programs<sup>17</sup>
    - Unwilling to remedy health and safety risks that may surface during energy assessments<sup>18</sup>
  - o Face a higher energy cost burden (very-low income Californians spend 29% of income on utilities versus the 5% spent by the average Californian<sup>19</sup>)
  - o Live in inefficient homes: low-income families pay 6.6 cents/sq. ft. for energy bills whereas adequate-income households 5.7 cents/sq. ft.<sup>20</sup>
  - o Live in older, homes that often have with poor indoor air quality (58% of low-income multifamily buildings in SDG&E territory were built before 1980)

AD-24

No household, especially a vulnerable, low-income rental household, should be forced to forego the multiple benefits of energy efficiency due to a landlord’s lack of awareness or owner non-cooperation. It is the City’s obligation under the General Plan to maximize efficiency (CE-I.2 and CE-I.7) and to “Implement development policies to protect public health, safety and welfare equitably among all segments of the population and address the needs of the disenfranchised” (LU-I.3). And, it is the CAP’s obligation under CEQA to be consistent with the General Plan and mitigate impacts of the plan such as those could arise from large-scale renewable energy installations. For these reasons, the CAP must include more robust education and outreach to landlords— particularly for buildings with low-income tenants— about financing opportunities and cost-saving benefits of efficiency, alongside requiring underperforming buildings to be upgraded.

C. Action 1.2: Municipal Energy Strategy

RECOMMENDATION:

- ✓ Municipal Energy Strategy should prioritize energy efficiency and renewable energy installations on municipal facilities located within disadvantaged communities identified by CalEnviroScreen.
- ✓ Target 1.2 should be to reduce energy consumption at municipal facilities by 50% by 2035.

AD-25

<sup>15</sup> About 65% of multifamily building owners and managers are *not* aware of any financing options that may assist with the expenses to upgrade or replace equipment and 35% have not heard of utility programs that provide income-qualified households with free equipment and energy efficiency services. (*ESAP Program Multifamily Segment Study*, December 2013, p83)

<sup>16</sup> [Energy Savings Assistance Program](#), [Energy Upgrade California](#), [Multifamily Energy Efficiency Rebates](#), [Single-Family Affordable Solar Program](#), [Multifamily Affordable Solar Program](#); Low-Income Weatherization Program, CSD <http://www.csd.ca.gov/Home/LowIncomeWeatherizationProgram.aspx>; Weatherization Assistance Program, <http://www.csd.ca.gov/services/residentialenergyefficiencyservices.aspx>

<sup>17</sup> 33% of multifamily building owners admit to being unsupportive, or only supportive with conditions, of tenant participation in utility programs if it means filling out paperwork and allowing contractors to have access to the property (The Cadmus Group, *ESAP Program Multifamily Segment Study*, December 2013, p92)

<sup>18</sup> HMG, *Lessons Learned through Piloting Energy Upgrade California Multifamily Programs*, July 2013, p 13

<sup>19</sup> The Cadmus Group, *ESAP Program Multifamily Segment Study*, Prepared for PG&E, December 2013, p15

<sup>20</sup> The Cadmus Group, *ESAP Program Multifamily Segment Study*, Prepared for PG&E, December 2013, p57

<sup>18</sup> Environmental Health Coalition comment letter on SD Climate Action Plan DEIR

Response to Comment AD-25

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

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REASON:

The state's Existing Buildings Action plan calls for local government leadership on energy efficiency<sup>21</sup> and also the City's General Plan calls for coordination of City energy programs with state agencies (CE-L2). EHC recommends the City to lead by example with a municipal energy efficiency target that is least as strong as, if not stronger than, the target for commercial facilities. As we recommend a nonresidential target of 50% reduction by 2035, we recommend the City also adopt that target for municipal facilities. The target currently in the draft CAP is 25% by 2035.

AD-25

Additionally, the CAP and EIR should include measures to ensure compliance with the CAP's social equity goals and the General Plan's commitments to prioritize and allocate city resources to ensure disenfranchised communities with the greatest need have access to public facilities and services (LU-I.3).

D. \*NEW\* Commercial Energy Conservation and Disclosure Ordinance

RECOMMENDATION:

- ✓ Set a goal to reduce energy consumption in nonresidential buildings by 50% by 2035
- ✓ Adopt an ordinance that requires annual benchmarking and disclosure of nonresidential buildings and multifamily buildings and requires efficiency improvements for underperforming (inefficient) buildings.
- ✓ Significantly increase the City's outreach and education for landlords and tenants about energy efficiency opportunities and funding opportunities, starting with the most inefficient buildings as identified by the energy benchmarking scores.

AD-26

REASON:

Commercial buildings represent a large portion of citywide energy demand and greenhouse gas emissions and are an opportunity for a cost-effective way to reduce greenhouse gas emissions and limit the need to construct new energy generation facilities. Many cities around the county have recognized this and have adopted commercial and residential conservation and disclosure ordinances. Unfortunately, the draft CAP does not identify a commercial building energy efficiency goal, action, or target and the DEIR fails to analyze the impacts of this missed opportunity. Maximizing efficiency in nonresidential buildings, in addition to residential buildings, should be used as mitigation for the potential need to construct new large energy generation facilities resulting from Action 2.1.

As there is significant overlap in commercial buildings and as multifamily buildings (4+ units) in terms of the tools to benchmark (EPA Portfolio Manager and Energy Star scores) and make efficiency improvements, the City could consider addressing commercial and multifamily buildings together in one ordinance, using the recommendations below. We suggest examining the ordinances from the City of Austin, Berkeley, and San Francisco and base models.<sup>22</sup>

E. New Buildings Energy Use (CAP Strategy 1 and Appendix A, Consistency Checklist)

<sup>21</sup> California's Existing Buildings Energy Efficiency Action Plan, CEC, March 2015

<sup>22</sup> Summarized by IMT in "Guide to State & Local Energy Performance Regulations, Version 3.0"  
<http://www.imt.org/uploads/resources/files/GuidetoStateandLocalEnergyPerformanceRegulations2015.pdf>

Response to Comment AD-26

This comment does not address the adequacy of the Draft EIR. Comment noted. Regarding commercial building benchmarking and disclosure, please see Response to Comment K-3. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

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RECOMMENDATION:

The EIR should include mitigation to rectify noncompliance with the General Plan and help minimize the potential need for new energy generation facilities, by including the following into the CAP and Appendix A Consistency Checklist Parts 2:

- ✓ Require all new buildings to be Net Zero Energy, including with on-site clean energy to meet their electricity needs.
- ✓ Require new buildings that are not within Transit Priority areas to produce more clean energy on site than they consume.

AD-27

REASONS:

CAP Strategy 1- General Plan Inconsistency

The DEIR fails to recognize the CAP's omission of energy efficiency requirements for all new buildings and significant remodels. As required in the City's General Plan policies CE-A.5 and HE-J.8, the CAP should include standards to require net zero energy consumption in new buildings.<sup>23</sup> The supporting measure in Strategy 2 "to achieve net zero energy consumption by employing sustainable or "green" building techniques for the construction and operation of buildings" is different and lesser than adopting new standards and requirements, as the General Plan calls for.

AD-28

Appendix A, Consistency Checklist- General Plan Inconsistency

CAP Appendix A "Consistency Checklist" for new, large developments is also grossly insufficient for the energy measures in Checklist Parts 2 and 3, is noncompliant with General Plan policies, and misses the opportunity to maximize efficiency and local solar to mitigate and minimize the need to construct large energy generation facilities, a potential impact identified by the DEIR for Action 2.1.

AD-29

First, the energy measures in the checklist apply only to residential developments over the screening threshold— only developments of an extremely large number of units—and not to commercial developments and individual residential construction (Consistency Checklist, pp. 6 and 9). This threshold misses the opportunity to maximize efficiency in a large portion of new residential development and all commercial development under the threshold, and would be inconsistent with the General Plan.

Second, the initial Checklist Part 2 requirement is to reduce energy use only by 15% below average residential energy consumption and reduce water use by only 5% below average (Consistency Checklist, pp. 6-7). Just slightly better than average is not a standard for which San Diego should strive, is not even consistent with state Title 24 standards for new construction, and is not consistent with the General Plan policies CE-A.5 and HE-J.8 to require net zero energy for new buildings. It is also a missed opportunity to minimize the need to construct new large energy generation. All new construction—residential and commercial of all sizes— should be required to be net zero energy by 2020.

AD-30

Third, Checklist Part 3 requires residential developments that are not within Transit Priority Areas only to use 25% less energy and only 8% less water than average. (Consistency Checklist, pp.9-10). As projects

AD-31

<sup>23</sup> General Plan Conservation Element CE-A.5: "Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings." General Plan Housing Element: "HE-J.8 Require net-zero energy for new residential buildings by the year 2020 to meet the State's goal outlined in the Long-Term Energy Efficiency Strategic Plan."

<sup>26</sup> Environmental Health Coalition comment letter on SD Climate Action Plan DEIR

Response to Comment AD-27

Please see Response to Comment N-3.

Response to Comment AD-28

Page 34 of the CAP specifies that the City develop a Zero Net Energy Policy for new municipal-owned buildings. The CPUC Strategic Plan and 2007 Integrated Energy Policy Report adopted zero net energy goals for new construction in California that will be enforced through future iterations of the CalGreen Building Code. Therefore, the City can rely on state legislation to implement this General Plan goal, and therefore, a City specific requirement is not specifically included within the CAP.

The supporting measures for Strategy 2: Clean & Renewable Energy call for the implementation of the General Plan Policy CE-A.5. Policy HE-J.8 includes a similar action, and the CAP implements both policies under this supporting measure.

Response to Comment AD-29

Please see Response to Comment N-3.

Response to Comment AD-30

Please see Response to Comment N-3.

Response to Comment AD-31

Please see Response to Comment N-3.

**Comment Letter AD**

not within Transit Priority Areas are likely to cause an increase in transportation-related emissions, these projects should be doing far more to reduce more greenhouse gas emissions from energy and water use. Such projects—both residential and commercial—should produce *more* clean energy than they consume and reduce water use by far more than 8%.

AD-31

**F. Water Analysis, Actions 1.3, 1.4, and 1.5**

**RECOMMENDATION:**

Given the strong correlation between energy, emissions, and water usage, we recommend lowering the target water usage number, using Sydney, Australia—a similar climate to San Diego—as a model for water conservation targets and strategies. We also recommend increasing the annual *share* of recycled water/potable use, as opposed to the annual *volume* (1.5.2), given that water conservation and usage reduction is the goal.

**REASON:**

The DEIR’s analysis of impacts on water resources fails to use accurate data. First, Appendix B overestimates the 2010 baseline per capital daily water use, which Appendix B-17 estimates to be 151 gallons/capita/day. However, 2010 city-wide daily per capita water use was approximately 127 gallons per capita per day, and is therefore already under the 2020 target of 140 gal/capita/day (in CAP Appendix B). This means that the draft’s 2020 target would be an *increase* from today’s water usage and consequently an increase in energy consumption and GHG emissions.

As Coastal Environmental Rights Foundation (CERF) pointed out in their October 2012 comments on the 2012 draft climate plan, which used the similar water data as used in the July 2015 plan—

*According to the City’s 2010 Urban Water Management Plan (UWMP), the City has already achieved this target – so no additional energy savings will result from baseline conditions. (2010 UWMP, pp. 3-6 to 3-10 [reflecting 2010 annual daily per capita water use was 127 gallons per capita per day]).... Before the City claims conservation as an energy reduction measure, it must accurately and transparently quantify its current and future anticipated water supply. Until this is done, the City must assume its water efficiency measures will not only fail to result in energy reduction, but will likely incentivize water waste because of the embarrassingly low UWMP and SBX7 targets set by the City.*

AD-32

Additionally, the proposed targets are to reduce water from the BAU level, not the 2010 baseline. (“The CAP includes three actions that result in per capita water consumption reduction from its *projected* per capita use in 2020 and 2035”, Appendix B-17).

Finally, Appendix B likely overestimate how much water will be reduced by the CAP’s Water Conservation Ordinance, since the Appendix B bases its analysis on the City of Berkeley’s ordinance (Appendix B-20), which includes requirements for actual upgrades, whereas it’s not clear that San Diego’s would require actual upgrades.

**GENERAL PLAN CONSISTENCY**

We disagree with the DEIR’s conclusion that the CAP is fully consistent with the General Plan (DEIR Section 3.A). To the contrary, without the mitigations we recommend in the prior sections of our comments, CAP Chapter 3 “Implementation and Monitoring” does not explicitly prioritize low-income,

AD-33

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**Response to Comment AD-32**

The commenter states that the use of 151 gallons per capita per day (gpcd) is incorrect and that the correct number for 2010 is 127 gpcd. CAP Appendix A has been updated to reflect the correct reference for 2010 gpcd usage of 151 gpcd. However, regardless of baseline water usage, the CAP only accounts for gpcd reductions that can be achieved from the relevant CAP actions (Actions 1.3, 1.4, and 1.5). Therefore, the GHG reductions accurately reflect the gpcd reductions attributable to implementation of the CAP.

Regarding the reductions estimated from implementation of Action 1.4, the commenter is correct that the reductions were estimated using the City of Berkeley’s Commercial and Residential Conservation Ordinances. The commenter asserts that this was inappropriate because the City of Berkeley’s ordinance included requirements for actual upgrades and the City of San Diego’s ordinance would not. Because the CAP is a plan-level document, the details of the specific ordinance called for under Action 1.4 has not yet been drafted. To ensure the appropriate reductions are achieved from this action, the City would monitor the CAP’s implementation. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment AD-33**

Regarding General Plan consistency, please see Response to Comment AD-5.

Comment Letter AD

disadvantaged, and disenfranchised populations and therefore is inconsistent with General Plan’s commitments to:

- o Improve mobility and accessibility for the non-driving elderly, disabled, and low income populations; (LU-I.10)
- o Prioritize and allocate city resources to ensure disenfranchised communities with the greatest need have access to public facilities and services; LU-I.3, LU-I.4, and LU-I.6.
- o Design transportation projects so that the resulting benefits and potential burdens are equitable; (LU-I.9.)
- o Eliminate disproportionate environmental burdens and pollution experienced by historically disadvantaged communities; LU-I.13)

AD-33

In addition, Chapter 3 also does not adequately comply with the following General Plan policies:

- o Provide adequate capacity and reduce congestion for all modes of transportation on the street and freeway system. (f) Evaluate RTP proposals for new or redesigned streets and freeways on the basis of demonstrated need and consistency with General Plan policies and community plan facility recommendations. (ME-C-2)
- o Make transit planning an integral component of long range planning documents and the development review process. (ME-B.9)
- o Use small, decentralized, and appropriately-sited energy efficient power. (CE-I.12)
- o Coordinate City energy planning programs with federal, state, and regional agencies. Maximize energy efficiency, use of clean renewable resources, and demand response.” (CE-I.2)
- o Pursue investments in energy efficiency and direct sustained efforts towards eliminating inefficient energy use. (CE-I.7)
- o Develop and implement sustainable building standards for new and significant remodels of residential and commercial buildings to maximize energy efficiency, and to achieve overall net zero energy consumption by 2020 for new residential buildings and 2030 for new commercial buildings. (CE-A.5)
- o Require net-zero energy for new residential buildings by the year 2020 to meet the State’s goal outlined in the Long-Term Energy Efficiency Strategic Plan. (HE-I.8)

AD-34

We urge the City resolve this inconsistency with the General Plan in the Final PEIR and Final CAP, by adopting the measures we recommend in the prior sections of our comments and our recommendations for the CAP below.

GHG SCREENING THRESHOLDS

The Single Use Development thresholds (Table 5, p. 25) are insufficient to ensure new development projects would not result in a significant GHG impact. First, the thresholds apply to all projects within a specified category regardless of whether they are consistent with the Climate Action Plan goals. Only after the screening criteria are applied is consistency with the CAP assessed. (Draft GHG Screening Criteria, p. 22). Thus, projects below the screening criteria could be located outside of the TPA and frustrate many of the CAP and City of Villages goals but progress without further review for GHG impacts because of the brightline thresholds.

AD-35

Further, in light of the incentive to meet the brightline thresholds, such developments may be favored, skewing historical patterns of development. Therefore, the use of historical building patterns (and associated emissions) to model brightline thresholds is inappropriate.

AD-36

Response to Comment AD-34

Regarding General Plan consistency, please see Response to Comment AD-5.

Response to Comment AD-35

Please see Response to Comment N-3.

Response to Comment AD-36

Please see Response to Comment N-3.

**Comment Letter AD**

We understand that the California Environmental Rights Foundation (CERF) has developed more extensive comments on the inter-related issues of the GHG Screening Criteria and use of the CAP for CEQA streamlining. EHC concurs with those comments and we urge the City to:

- Analyze the Screening Criteria in the DEIR itself;
- Develop Screening Criteria based on compliance with the CAP first, using thresholds derived from the CAP.

AD-37

**CONCLUSION**

With the incorporation of Environmental Health Coalition’s recommendations detailed in this letter and the previous Scoping comment letter, EHC hopes to be able to support the adoption of the City of San Diego Climate Action Plan. San Diego is long overdue to do its part to combat climate change, reduce air pollution, achieve social equity, and improve quality of life, health, economy and environment for all San Diegans. The emphasis of the CAP and the implementing ordinances must be on those communities that are most impacted by climate change and who have the fewest resources to adapt and achieve resilience.

Sincerely,

Diane Takvorian  
Executive Director

Joy Williams  
Research Director

**Response to Comment AD-37**

Please see Response to Comment N-3.

Comment Letter AE

# BOULEVARD PLANNING GROUP

P.O. BOX 1272, BOULEVARD, CA 91905

September 29, 2015

TO: Mark Wardlaw, Director, San Diego County PDS via: [Mark.Wardlaw@sdcounty.ca.gov](mailto:Mark.Wardlaw@sdcounty.ca.gov) and Rebecca Malone, Associate Planner, City of San Diego Planning Dept., via: [DSDEAS@sanidiego.gov](mailto:DSDEAS@sanidiego.gov)

FROM: Donna Tisdale, as Chair, Boulevard Planning Group; 619-766-4170; [tisdale.donna@gmail.com](mailto:tisdale.donna@gmail.com) & as an individual; PO Box 1275, Boulevard, CA 91905

RE: San Diego Climate Action Plan Programmatic Draft EIR - SCH NO.: 2015021053<sup>1</sup>

The Boulevard Planning Group<sup>2</sup> is an elected volunteer land use advisory group, serving the predominantly low-income Boulevard Planning Area<sup>3</sup> of rural East County, under the jurisdiction of San Diego County. County policy requires that we address comments directly to them with a copy to any non-County entities.

At our regular meeting held on September 3<sup>rd</sup>, our group voted unanimously to authorize me, the Chair, to submit comments on the City's CAP which includes reliance, in part, on large (industrial) scale renewable energy projects located outside the City's jurisdiction. Those unidentified and unanalyzed projects have the very real potential for significant, cumulative, and cumulatively considerable impacts within and adjacent to our Boulevard Planning Area and other rural low-income, groundwater dependent, and high fire risk communities that have been disproportionately targeted for renewable energy sacrifice zones and high-voltage utility corridors. These comments are limited and incomplete due to other obligations.

*In general, we support realistic efforts to improve air quality, energy efficiency, and quality of life, while conserving water and other natural resources while avoiding disproportionate, significant, and cumulatively considerable adverse impacts for targeted communities and corridors.*

We call your attention to the September 23<sup>rd</sup> article in the Voice of San Diego, *City's Bold Climate Action Plan Could be Nullified Before It Even Passes*<sup>4</sup>, that points to the SANDAG's position that the CAP numbers (to cut GHG emissions by 50% by getting more people to walk, bike, or take transit to work) are far-fetched, based on an analysis of how many people are likely to commute in 2035 that it conducted as part of the long-term transportation plan its board is expected to adopt next month.

AE-1  
AE-2

<sup>1</sup> <http://www.sandiego.gov/planning/programs/ceqa/2015/153107-sdcapdraftpeir.pdf>

<sup>2</sup> <http://www.sandiegocounty.gov/content/dam/sdc/pds/docs/PG/BoulevardCPGfs.pdf>

<sup>3</sup> <http://www.sandiegocounty.gov/content/dam/sdc/dplu/docs/GP/S-Boulevard.pdf>

<sup>4</sup> <http://www.voiceofsandiego.org/topics/land-use/citys-bold-climate-action-plan-could-be-nullified-before-it-even-passes/>

## Response to Comment AE-1

Comment noted.

## Response to Comment AE-2

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Comment Letter AE**  
 While we understand the good intentions related to your City's 100% renewable energy goals, from our perspective as a disproportionately targeted rural community, industrial wind and solar are not so clean and green. They can alter communities and quality of life for residents and wildlife.



**Based on our first-hand experience:**

- Aggressive renewable energy goals generally require the disruptive and neighborhood-altering conversion of tens of thousands of acres of land/habitat and hundreds of miles of new high voltage utility lines; the use of hundreds of millions of gallons of our drought stressed sole-source groundwater, or potable water trucked in from the City of San Diego (70 miles away) to clear grade carbon sequestering chaparral, meadows, and soils (wildlife habitat); amended community plans—despite justified community opposition; altered public lands and regional recreation areas; increased fire ignition sources in our drought-stressed and underserved Very High Fire Hazard area; adverse impacts to public health and safety and emergency services; increased noise, low-frequency vibrations, electrical and light pollution; loss of productivity due to health impacts and sleep disruption, loss of views that support tourism; degraded quality of life and property values; impacts to wildlife, including sensitive and endangered species, and more.

**ES-1 Summary of Impacts and Mitigation Measures ES-6 2-1**

**A. Land Use:**

- Mitigation Measure LU-1: Siting of Large-scale Renewable Energy Projects.
- This is just an inadequate plan to make a plan and does not apply to large-scale projects that may be sited outside City jurisdiction.
- This incomplete mitigation measure fails to include the required information / evidence to support the claim that it will reduce impacts to less than significant.

**CAP Strategy 2: Clean & Renewable Energy; Table 2-5 @ page 2-20 raises concerns for Boulevard and other rural communities targeted by renewable energy generators and SDG&E:**

- The Potential Physical Changes to Environment section includes the following: "Would require the construction of distributed generation (small-scale renewable) on new and existing buildings, including solar photovoltaics, wind-turbines, and energy storage options. May directly or indirectly require the construction of large-scale renewable energy generation systems within our outside of the City to satisfy large demand. May therefore result in construction-related impacts (air quality, GHGs, traffic, noise) effects on visual quality (coastal views, hillsides, near

**Response to Comment AE-3**

The programmatic-level impact analysis of implementation of CAP Action 2.1 is analyzed in the Draft EIR.

**Response to Comment AE-4**

As stated in Chapter 3.A, Land Use of the Draft EIR, the Mitigation Measure LU-1, Siting of Large-Scale Renewable Facilities, is expected to reduce land use impacts associated with siting of large-scale renewable facilities to a level below significance. While potential land use conflicts could occur outside of the City's jurisdiction, as stated in the Draft EIR, land use conflicts would either not occur or would have to be resolved by the applicable local agency, which would be considered in the environmental review for those proposed facilities. The analysis in the Draft EIR was appropriately limited to match the scope of discretion the City has authority to exercise in that the City would not have jurisdiction over any large scale renewable energy projects located outside of the City's jurisdiction. *See San Diego Navy Broadway Complex Coalition v. City of San Diego*, 185 Cal. App. 4th 924, 935-36 (2010). To provide further clarification, the text on Draft EIR page 3.A-20 has been revised as follows:

**Significance after Mitigation**

With implementation of Mitigation Measure LU-1, potentially significant land use conflicts from siting of large-scale renewable energy facilities would be avoided. In the case where projects are found to have the potential for conflicts, additional environmental review would be required to determine the significance of impacts, the potential for mitigating impacts, and to consider project alternatives that may reduce or avoid impacts. After mitigation, this impact would be less than significant. The physical impacts that could result from land use conflicts may be significant and unavoidable and those impacts are analyzed in Sections 3.B (Visual Effects and Neighborhood Quality), 3.C (Air Quality), and 3.F Transportation and Circulation.

**Comment Letter AE**

*open space areas, scenic highways); footprint effects associated with Greenfield development, including biological, hydrologic, and cultural resource impacts.” (emphasis added)*

- Point of use generation is much preferred over large-scale projects that can disrupt and degrade existing land uses and force unwelcome changes to hard-fought community plans and previously protected lands and resources, as discussed above.
- Boulevard has already been run through the wringer by wealthy and politically connected developers for multiple industrial scale wind, solar, and transmission projects.
- We are unwilling hosts and ask that you take that into consideration when making long-range decisions that can result in significant and cumulatively considerable adverse impacts—outside your jurisdiction. We have no vote and no representation on your Council.
- Against great odds, community efforts have successfully helped fend off three industrial wind turbine projects and numerous large solar projects and will continue to do what we can to defend our ruggedly beautiful area, our neighborhoods, and our rural quality of life.

**From Governors’ Office of Planning and Research on CEQA & Climate Change:**

- “Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change. (See CEQA Guidelines § 15126.2(a))”<sup>5</sup>
- **The CAP PDEIR fails to comply with this guidance from OPR**

**Boulevard’s ruggedly beautiful McCain Valley National Cooperative Land and Wildlife Management and Recreation Area, in the photo (left) below (taken by the late Bill Parsons) has been approved for Iberdrola’s Tule Wind project, over strong community objections due to increased fire risk, noise, light and electrical pollution and impacts to residents, visitors, Golden Eagles, Bighorn Sheep and other wildlife. Litigation is pending in the 9<sup>th</sup> Circuit Court of Appeals. The photo on the right shows current backcountry night skies in Boulevard, the way we want to keep them!**



The photos below show the Kumeyaay Wind turbine fire (before and after) that placed Boulevard and other communities at risk. Luckily, only one small ground fire was ignited by flaming debris from the composite turbine blades. Fire fighters said it would have been a different story if the fire had occurred the day before during a Santa Ana wind event.

<sup>5</sup> [http://opr.ca.gov/s\\_ceqaandclimatechange.php](http://opr.ca.gov/s_ceqaandclimatechange.php)

AE-5

AE-6

**Response to Comment AE-5**

Please see Response to Comment AE-4. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting. At a time when a specific large-scale renewable energy facility is proposed, when there is sufficient detail to enable meaningful environmental review, the impacts associated with implementation of such a facility would be analyzed more fully.

**Response to Comment AE-6**

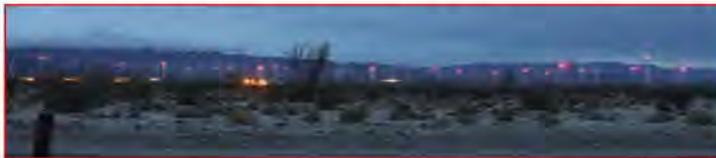
The comment appears to state that the Draft EIR should have included a discussion of the impacts associated with placing large scale renewable energy projects in hazardous locations. The CAP does not propose specific locations for the siting of large scale renewable energy facilities; rather, CAP Action 2.1, which is the implementation of a community choice aggregation program (CCA) or similar program, may result in construction of large scale renewable energy projects to provide the renewable energy under the CCA. That such a future project would result in placing that project in a hazardous location is speculative.

Comment Letter AE



Back in 2009, the Kumeyaay Wind facility experienced a catastrophic electrical failure that arced between all 25 turbines, resulting in loss of control and need to replace the majority of components on all turbines including all 75 turbine blades. The damaged blades sat on the ground for years while the turbine owners and operators sued each other. No explanation on the cause of the failure has ever been offered to the community. The turbines are located on tribal land leased from the Campo Kumeyaay Nation. Professional testing by Wilson Ihrig & Associates confirmed high levels of noise and infrasound inside surrounding homes on adjacent Manzanita tribal lands and private homes up to 5 miles distant. Similar results were documented in homes impacted by the Ocotillo Wind turbines located in Imperial County. Additional testing confirmed electrical pollution in the same homes and was linked to wind turbine operations.

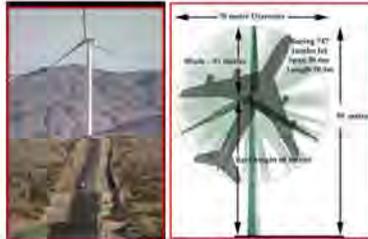
The photo below documents the impacts from the FAA required red lights at the Ocotillo Wind facility that flash all night every night where residents of the tiny desert community of Ocotillo used to enjoy dark skies and quiet evenings void of the industrial blight and the health degrading electrical and light pollution that has been foisted on them. The energy serves SDG&E customers while Ocotillo's energy comes from Imperial Irrigation district. They are suffering through no fault of their own.



AE-6

**Comment Letter AE**

The photo below (left) shows the Ocotillo Wind turbines impact on historic Hwy 5-2 adjacent to the Anza Borrego Desert State Park. The turbines are located on previously protected, culturally and biologically sensitive public land, surrounding the tiny Ocotillo community on three sides. The diagram on the right provides more perspective on the bulk and scale of industrial wind turbines. They are not compatible within miles of residential, recreation, or other sensitive areas/ receptors.



**Soitec Solar- just one example of wasted public funds and increased electrical fire ignition sources that places local and distant resources at risk:**

- Soitec Solar proposed 4 CPV projects, on almost 1,200 acres (2 square miles) in Boulevard
- **Soitec Solar’s Emergency Services Capabilities Assessment and Cumulative Impact Mitigation**<sup>6</sup> report, dated 30 December 2013, was included in the PFEIR.
- The report identified a wildfire threat to all structures and communities to the west of the project in east and southeast San Diego County.
- SDCFA estimates that nearly 17,000 residences (and other structures) may be at risk of loss during a wind driven wildfire within this southeastern San Diego County wildfire corridor (County of San Diego 2011).
- San Diego County’s unjustified approval of the Soitec project was recently overturned by the court for failure to recirculate the PFEIR after belatedly adding 160 cargo containers of batteries to Soitec’s Rugged Solar project, and more. A recirculated PFEIR will be heard on October 14<sup>th</sup>.
- In January 2015, Soitec announced their exit from the solar business<sup>7</sup>.
- September 2011, they announced the sale of their Rancho Bernardo manufacturing facility<sup>8</sup> that Mayor Jerry Sanders specifically expanded the San Diego Enterprise Zone for, back in 2011.
- Late 2014, SDG&E announced they had terminated all their Soitec Solar Power Purchase Agreements<sup>9</sup>, basically due to failure to perform.
- According to the Voice of San Diego, “Soitec’s arrival was supposed to be a shining example that large-scale manufacturing was possible in San Diego after all. State, local and national leaders lined up to make Soitec a success. In the months following the 2011 announcement, the

AE-6

<sup>6</sup> [http://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/Appendix\\_3.1.7-1\\_Emergency%20Service%20Capabilities%20Assessment.pdf](http://www.sandiegocounty.gov/content/dam/sdc/pds/ceqa/Soitec-Documents/Final-EIR-Files/Appendix_3.1.7-1_Emergency%20Service%20Capabilities%20Assessment.pdf)  
<sup>7</sup> <http://finance.yahoo.com/news/soitec-soitec-solar-system-154701464.html>  
<sup>8</sup> [http://www.sdt.com/news/article.cfm?SourceCode=20150910rde&\\_t=Rancho+Bernardo+industrial+building+one+Via+Espino+sell+Vfja+FB+hfs](http://www.sdt.com/news/article.cfm?SourceCode=20150910rde&_t=Rancho+Bernardo+industrial+building+one+Via+Espino+sell+Vfja+FB+hfs)  
<sup>9</sup> <http://www.greentechmedia.com/articles/read/CPV-Hopeful-Soitec-Latest-Victim-of-the-Economics-of-Silicon-Photovoltaics>

**Comment Letter AE**  
 company received a [\\$25 million grant](#) from the federal Department of Energy to expedite construction of its San Diego home and signed on for [state enterprise zone tax incentives](#). The city put its permits on fast-forward".<sup>10</sup>



**Public Notice issues:**

- At page 4 of 10, San Diego County Planning and Land Use should be corrected to their new title, San Diego County Planning and Development Services (PDS).
- At page 6 of 10 of the Public Notice, SDG&E is listed under the "Other Governments". SDG&E is a monopoly utility not a government entity
- **We agree with the RECOMMENDED FINDING: "Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project could potentially result in significant environmental impacts to the following areas:** Land Use, Visual Effects and Neighborhood Character, Air Quality, Greenhouse Gas Emissions, Historical Resources, Transportation and Circulation, Utilities, and Water Supply", and that these impacts cannot be mitigated to less than significant.
- **The following topics, found to be not significant in Chapter 7, could prove to be very significant with physical changes to impacted rural communities and the natural environment:** agricultural resources, biological resources, geologic conditions, health and safety and hazardous materials, hydrology and water quality, mineral resources, noise, paleontological resources, and public services and facilities.

**CEQA Compliance issues:**

- An EIR is supposed to inform public agency decision makers and the general public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.
- In relation to large-scale renewable energy projects, the Draft PEIR fails to comply with CEQA Guidelines Section 15121, and the stated purpose of this PEIR to serve as an informational document that: ...will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project
- The PDEIR fails to include, analyze, and mitigate impacts to resources, the physical environment and related quality of life, in and around the Boulevard Planning Area and others, that may be impacted by large-scale renewable energy projects located outside City of San Diego jurisdiction.

<sup>10</sup> <http://www.voiceofsandiego.org/2014/12/19/the-darling-of-san-diego-solar-manufacturing-is-on-its-death-bed/>  
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AE-6  
 AE-7  
 AE-8

**Response to Comment AE-7**

The comment states that the CAP could have significant impacts with respect to topic areas that were found not to be significant. However, no specific comment as to the adequacy of the Draft EIR is provided. Comment noted.

**Response to Comment AE-8**

Under CEQA, a Program Level EIR can function as a first-tier environmental document that assesses and documents the broad environmental impacts of a program with the understanding that a more detailed site-specific review may be required to assess future projects implemented under the program, pursuant to CEQA Guidelines Section 15168. The analysis contained in this EIR may also be used as a reference for subsequent environmental review of projects facilitated by implementation of the strategies and actions in the CAP. The series of actions analyzed in the Program Draft EIR includes all GHG reduction strategies and actions contained in the CAP. While the Program Draft EIR will identify potential impacts that would result from Project implementation, the analysis is not detailed to the level of site specificity as sufficient details to be able to conduct meaningful environmental review at that level are not currently available or known. The Program Draft EIR identifies a range of potential impacts resulting from implementation of the CAP and identifies mitigation measures that reduce identified potentially significant effects, as needed.

**Comment Letter AE**

- Climate Change predictions indicate that rural East County will be exposed to higher temperatures and increased fire risk, altered rain patterns, potentially reduced groundwater resources, and more.

**Water Supply for large-scale projects are generally vastly underestimated and problematic overall, including SDG&E's under reported GHG impacts related to long-hauling up to 60 million gallons of potable water from City of San Diego:**

- Precious potable from rural drought-stressed sole-source aquifers and San Diego City's supposedly restricted potable water sources are required for construction of large-scale projects.
- SDG&E's Sunrise Powerlink project long-hauled an undisclosed amount of potable water from the City of San Diego for construction of their \$1.9 billion project that spans over 100 miles.
- SDG&E's ECO Substation project, constructed east of Jacumba, long-hauled approximately 60 million gallons of potable water from the City of San Diego, according to the attached Water Supply report (November 2014) provided by the CPUC project manager.
- In a June 11, 2014, SDG&E's Minor Refinement Request Form informed the CPUC that the City of San Diego had increased their water availability for the ECO Substation project from 50 million gallons to 66.5 million gallons<sup>11</sup>.
- In an earlier Minor Refinement Request, dated 9-20-13, SDG&E informed the CPUC that their original estimate of 30 million gallons (FEIR/EIS Water Supply Plan) was inadequate and they needed closer to 90 million gallons.<sup>12</sup>
- Page A-1 of SDG&E's 6-11-14 document includes the following information documenting 1.15 million miles assumed for GHG emissions:**
  - "MPR request #8 discussed that the mileage associated with water truck deliveries for the remainder of construction will remain less than the 1.15 million miles assumed in the Final EIR/EIS to be expended during the Project's period of peak demand (i.e., mass grading of the ECO Substation). As depicted in Attachment B: Mileage Summary, the use of an additional 16.5 million gallons of water trucked from the City of San Diego will not increase Project mileage beyond the 1.15-million-mile limit. Therefore, the miles associated with water truck deliveries from the City of San Diego will not increase from what was analyzed in the Final EIR/EIS and previously approved through MPR #8. As a result of the above discussion, the total emissions for the requested refinement will be consistent with what was analyzed in the Final EIR/EIS, and the requested refinement will not trigger an exceedance of the greenhouse gas emissions threshold. Therefore, the requested refinement will not result in a new, significant impact or a substantial increase in the severity of a previously identified impact to air quality, which was evaluated as significant and unavoidable (Class I) in the Final EIR/EIS, or to climate change, which was evaluated as less than significant (Class III) in the Final EIR/EIS."
- Corrections to SDG&E's Minor Project Refinement Report # 14 produced by a non-profit's attorney revealed the errors and misrepresentations that undercounted water use and mileage<sup>13</sup>:**

<sup>11</sup> [http://www.cpuc.ca.gov/environment/info/dudek/ECOSUB/MPR%2014\\_SDG&E\\_Request.pdf](http://www.cpuc.ca.gov/environment/info/dudek/ECOSUB/MPR%2014_SDG&E_Request.pdf)

<sup>12</sup> [http://www.cpuc.ca.gov/environment/info/dudek/ECOSUB/MPR\\_8\\_Request.pdf](http://www.cpuc.ca.gov/environment/info/dudek/ECOSUB/MPR_8_Request.pdf)

AE-8

AE-9

**Response to Comment AE-9**

As specified in the CAP, on page 35, the City will “[c]omplete a citywide Community Choice Aggregation Feasibility Study” as part of the implementation strategy for Action 2.1. This feasibility study would consider some of the factors identified by the commenter. While it is possible that large scale renewable energy facilities may be constructed in the future that would provide renewable energy to a CCA under CAP Action 2.1, the specific locations of such facilities are not currently known. Please see Response to Comment AE-8.

**Comment Letter AE**

- SDG&E's water use through May 31, 2014 was undercounted by approximately 4million gallons (math error).
  - The "Maximum Water Use Allowed" identified in SDG&E's Table 1 from MPRR 14 was misleading. Only 19.5 million gallons of water remained available for Project use as of May 31. It is now July and the water trucks are continuing.
  - The total mileage for all water truck loads up to May 31 was undercounted by approximately 840,000 miles. The total mileage as of May 31, 2014 is 1,331,875 miles.
  - By May 31, water trucked just from the City of San Diego had already exceeded the 1.15 million water truck miles available for project completion as analyzed in the Final EIR for green house gas impacts. The water trucked from the City of San Diego has exceeded this limit by 35,260 miles! The Project through May 31, 2014 is 181,875 miles over the 1.15 million mile limit.
  - 439,718 additional truck miles and related green house gases are needed to truck the remaining 19.5 million gallons of water for the project through completion; this additional quantity further exceeds the 1.15 million mile limit.
  - *When added together, the miles already used (1,331,875), and the miles required to haul the remaining water (439,718), represent an increase 621,593 miles over the 1.15 million mile limit. This total is more than 50% greater than the mileage cap, a substantial violation of this important restriction. (emphasis added)*
- The Water Supply Plan and water sources were not produced until after the close of public comment.
  - Several of the sources had to be terminated due to lack of authority to sell water, failure to secure adequate approvals to sell water, and loss of groundwater recharge.
  - *Rural East County has no access to imported water. The majority of residents rely on their own wells, at their own expense. Once our groundwater resources are drained or otherwise compromised, we have no real economically viable alternative.*

**Scope of Environmental Analysis is inadequate**

- The Life Cycle Assessments<sup>14</sup> and impacts of all forms of renewable energy and increased transmission and any battery storage projects, and related recycling/disposal must be addressed and mitigated from cradle to grave. There are GHG impacts throughout their life cycles.



AE-9

AE-10

**Response to Comment AE-10**

The purpose of the analyses contained in the Draft EIR is to measure the potential environmental impacts that are likely to result from implementation of the policies and reduction strategies contained in the CAP. The proposed CAP is a policy document that provides direction for how GHG emissions should be reduced within the City, and the analysis identifies the potential for implementation of those policies to cause physical changes to the environment.

Please see Draft EIR Section 3.D (Greenhouse Gases). The EIR assumes that implementation of proposed CAP actions could result in both construction-related and operations-related GHG emissions. However, as indicated in the discussion of expected GHG emissions reductions from implementation of the CAP on Draft EIR pages 3.D-17 and 3.D-18, these actions would also result in substantial long-term reductions in GHG emissions.

<sup>13</sup> Letter from Law Offices of Stephan C. Volker to CPUC Project Manager Eric Chiang, July 17, 2014 (A.09-08-003)  
<sup>14</sup> <http://www.epa.gov/nrmr/std/ca/ca.html>

**Comment Letter AE**

**Energy Resources section, relying on SDG&E's 2010 baseline information, is outdated and inadequate:**

- This section must be updated for fully informed public comments and decision making.
- *SDG&E issued a press release on August 25, 2015<sup>15</sup> claiming they had "...achieved a new record of 1,042 megawatts (MW) of renewable energy generation on its power grid."* A combination of bright sunshine and strong wind conditions in the San Diego and Imperial Valley helped to generate record-setting amount of green energy for our customers" "We are proud to have delivered 33 percent renewable power over the last twelve months—the first utility to do so."
- *The 1,042 MW figure does not include the energy production by 61,000 SDG&E rooftop solar customers.*
- Just one month later, an additional 951 solar customers were added, according to SDG&E's Net Energy Metering (NEM) Dashboard website.
- *As of August 26, 2015, SDG&E's service area now includes 69,951 on-site solar installations with a total of 447.2 MW. They have 159.9MW remaining in their NEM Program cap<sup>16</sup>.*
- In addition, the Pio Pico, Carlsbad Energy Center and other natural gas powered peaker plants have been approved and/or constructed in SDG&E's territory and must be included in an updated Energy Resources section.
- To date, most renewable energy requires backup fossil fuel generation to balance the grid.
- Since 2010, numerous 500kV and other high voltage lines have been approved and / or constructed for SDG&E throughout San Diego County, including Boulevard and other rural communities. They are very disruptive.
- I took the photo below from Old Hwy 80 where a sky crane dropped one of the Sunrise Powerlink towers onto the ground during very disruptive construction operations. At one time SDG&E had approximately 40 helicopters in the air at the same time. It was devastating for impacted residents, livestock and wildlife. Helicopters were grounded for a period after a Golden Eagle was hit and knocked from the sky.



- Numerous large scale rural substations, including ECO Substation (right) and Suncrest Substation (left) have also been constructed in culturally, biologically, and visually sensitive areas of rural East County to help SDG&E import renewable energy from Imperial County, East County, and northern Baja California. The CAP will likely require additional infrastructure and impacts.

<sup>15</sup> <http://www.sdge.com/newsroom/press-releases/2015-08-25/sdge-reaches-new-milestone-renewable-power-delivery>

<sup>16</sup> <http://www.sdge.com/clean-energy/net-energy-metering/overview-nem-cap>

AE-11

**Response to Comment AE-11**

Comment noted. Regarding the use of rooftop solar to provide renewable energy, it is assumed that some of the renewable energy under CAP Action 2.1 would also come from small-scale renewable projects. See for example Draft EIR page 2-21. Please also see Responses to Comments AE-8 and AE-9.



Comment Letter AE

AE-11

- In December 2014, SDG&E announced their Sunrise Powerlink project, completed in 2012, had reached their goal of 1,000 MW of renewable energy from 7 of 10 wind and solar contracts signed for projects in Imperial County<sup>17</sup>.
- Approximately 20,000 acres of Imperial County's productive farmland has already been approved or converted to industrial scale solar projects and another 12,000 or so acres of previously protected Limited Use land in California Desert Conservation Area has been converted to industrial wind energy for Ocotillo Express Wind<sup>18</sup> project that surrounds the tiny desert town of Ocotillo, far too close and too noisy for residents and wildlife.
- The approved and/or already constructed solar projects total approximately 2,672MW of energy. These projects have displaced existing agricultural uses and related jobs and support businesses. Long-term employees and suppliers have been terminated.
- Maps of the industrial-scale solar/wind conversion are posted at Imperial County's PDS website @: <http://www.icpds.com/?pid=2934>
- *According to one construction company's website<sup>19</sup>, the 1,500 acre SolarGen 2 solar project in Imperial Valley required mass grading of 400,000 cubic yards of previously productive irrigated farmland (with senior water rights) and 85,000 lf of chain link fencing—not counting the millions of solar panels and racking, miles of conduit and more.* The life cycle of which are all energy intensive and likely consume fossil fuels at some point or another during their life cycle.
- Conversion of productive farmland also removes carbon sequestration from growing crops and the wildlife habitat in and around the fields, drains, and canals.
- Imperial County is part of the Pacific Flyway that attracts and supports a wide variety of resident and migrant avian species and more.
- Public comments made on September 22<sup>nd</sup> to Imperial County Board of Supervisors on their Renewable Energy Transmission Element, by Kay Pricola, Executive Director of the Imperial Valley's Coalition of Agriculture Labor and Business (COLAB)<sup>20</sup>, raised concerns with inadequate reclamation bonding for agricultural land, the need to preclude the use of chemicals that are permanent soil sterilizers as a weed control effort because the impact to the soil and its surrounding area can never be repaired, the need to set a standard for solar panels to preclude

<sup>17</sup> <http://www.sdge.com/newsroom/press-releases/2014-12-18/sdge%E2%80%99s-sunrise-powerlink-reaches-1000-megawatt-renewable-energy>

<sup>18</sup> <http://icpds.com/CMS/Media/Imperial-County-Wind-Power-10-31-13.pdf>

<sup>19</sup> <http://www.cswcontractors.com/projects.asp?page=First+Solar+Gen+2>

<sup>20</sup> [http://colabimperial.com/Board\\_Staff.html](http://colabimperial.com/Board_Staff.html)

**Comment Letter AE**

the use of any toxic materials, and that the employment projections for the recently approved solar projects were overstated.

- A copy of COLAB's comments are attached and incorporated by reference.

**Planning Context is outdated:**

- SANDAG's Regional Transportation Plan (2013) was rejected by the Court of Appeals as inadequate in late 2014<sup>21</sup>.
- Our comments on the revised RTP EIR (7-15-15) are attached and incorporated by reference. SANDAG's response to comments is inadequate.

**Project Location & Description are inadequate:**

- The PDEIR is inadequate. It fails to identify, analyze or mitigate for any large-scale renewable energy projects that may be relied upon to meet the proposed CAP but located outside the City's jurisdiction.

**Project Objectives, listed below, do not address impacts from large-scale renewable energy projects:**

- Improve public health by removing harmful pollutants from our air and improve water quality;
- Increase local control over the City's future by reducing dependence on imported water and energy.

**The CAP is Growth Inducing**

- See previous comments on large-scale renewable energy projects and utilities required to support CAP objectives.
- More energy and increased energy efficiency can support increased growth which, in turn, can require more energy.

**Utilities**

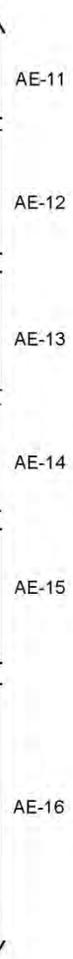
- While power lines in the City of San Diego are being undergrounded to enhance aesthetics and safety<sup>22</sup>, Boulevard and other rural communities have already been impacted, and will continue to be impacted, by large-scale regional electrical utility projects meant to serve the mostly urban customers of SDG&E, Southern California Edison, and other for-profit utilities.
- SDG&E's Sunrise Powerlink<sup>23</sup>
- SDG&E's ECO Substation<sup>24</sup> with rebuild of Boulevard Substation and 14 miles of new 138kV line.
- I took these photos to compare the sharp contrast between what the overhead and underground sections of the ECO Substation lines look like. Note how tiny the construction trucks appear on the newly graded access road in the photo on the left. If not for the efforts of a local non-profit group's intervention at the CPUC, the entire route would have been overhead.

<sup>21</sup> <http://www.ldsupra.com/legalnews/eir-for-sandags-regional-transportation-93351/>

<sup>22</sup> <http://www.sdge.com/newsroom/press-releases/2014-12-18/sdge%E2%80%99s-sunrise-powerlink-reaches-1000-megawatt-renewable-energy>

<sup>23</sup> <http://www.sdge.com/newsroom/press-releases/2012-06-18/sunrise-powerlink-fact-sheet>

<sup>24</sup> <http://www.sdge.com/key-initiatives/eco-substation/eco-substation-project>



**Response to Comment AE-12**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment AE-13**

Please see Responses to Comments AE-4, AE-5, AE-8, and AE-9.

**Response to Comment AE-14**

The purpose of the project objectives is to set forth the underlying purpose of the CAP. Please see Draft EIR Chapter 2.

**Response to Comment AE-15**

The CAP does not propose growth-inducing development, and would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. Growth inducement is more fully discussed in Draft EIR Chapter 5.

**Response to Comment AE-16**

See Draft EIR Chapter 3.B regarding visual effects and neighborhood quality. Please also see Response to Comment AE-10.

Comment Letter AE



- SDG&E's Master Special Use Permit to upgrade lines and over 1,800 poles within and around the Cleveland National Forest, including conversion of 69kv lines in Boulevard to 138kv lines.<sup>25</sup>

**Estimated GHG Reduction Potential of Cap Strategies 2-5 2-2**

- **Reliance on 2010 Baseline Emissions is inadequate due to the fact that the economy and emissions had not yet recovered from the Great Recession according to a report published in July 2015 Nature Communications 6, Article number: 7714 doi:10.1038/ncomms8714 : Drivers of the US CO<sub>2</sub> emissions 1997–2013<sup>26</sup>** by Kulshuang Feng, Steven J. Davis, Laixiang Sun & Klaus Hubacek
  - Abstract (emphasis added): "Fossil fuel CO<sub>2</sub> emissions in the United States decreased by ~11% between 2007 and 2013, from 6,023 to 5,377 Mt. This decline has been widely attributed to a shift from the use of coal to natural gas in US electricity production. However, the factors driving the decline have not been quantitatively evaluated; the role of natural gas in the decline therefore remains speculative. Here we analyse the factors affecting US emissions from 1997 to 2013. Before 2007, rising emissions were primarily driven by economic growth. After 2007, decreasing emissions were largely a result of economic recession with changes in fuel mix (for example, substitution of natural gas for coal) playing a comparatively minor role. Energy-climate policies may, therefore, be necessary to lock-in the recent emissions reductions and drive further decarbonization of the energy system as the US economy recovers and grows."

**Air pollution & Particulate Matter increase with large-scale wind, solar and transmission projects**

- In San Diego County, dust is largest PM10 source<sup>27</sup>;
- Major issue for large-scale wind and solar projects that remove existing chaparral, disturb soil crusts, and create new sources of dust and other air pollutions
- EPA basic PM information<sup>28</sup>;

<sup>25</sup> <http://www.sdge.com/key-initiatives/cleveland-national-forest-power-line-replacement-projects>

<sup>26</sup> <http://www.nature.com/ncomms/2015/150721/ncomms8714/full/ncomms8714.html>

<sup>27</sup> [http://www.epa.gov/cgi-bin/broker?\\_service=data&\\_debug=0&\\_program=dataprog.state\\_1.sas&pol=PM10\\_PRI&stfjps=06](http://www.epa.gov/cgi-bin/broker?_service=data&_debug=0&_program=dataprog.state_1.sas&pol=PM10_PRI&stfjps=06)

<sup>28</sup> <http://www.epa.gov/airquality/particulatepollution/basic.html>

AE-16

AE-17

AE-18

**Response to Comment AE-17**

The CAP has been developed in response to State legislation and policies that are aimed at reducing California's greenhouse gas (GHG) emissions. Please see Response to Comment J-1. When the City set its 2020 and 2035 targets pursuant to CARB's guidance, 2010 was the most recent year for which the City had data.

**Response to Comment AE-18**

Please refer to Draft EIR Chapters 3 and 5 for discussions regarding potential environmental effects from implementation of CAP Action 2.1.

**Comment Letter AE**

- Particle pollution (also called particulate matter or PM) is the term for a mixture of solid particles and liquid droplets found in the air. Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye. Others are so small they can only be detected using an electron microscope.

**How Big is Particle Pollution?<sup>29</sup>**



- Particle pollution includes "inhalable coarse particles," with diameters larger than 2.5 micrometers and smaller than 10 micrometers and "fine particles," with diameters that are 2.5 micrometers and smaller. How small is 2.5 micrometers? Think about a single hair from your head. The average human hair is about 70 micrometers in diameter – making it 30 times larger than the largest fine particle.
- These particles come in many sizes and shapes and can be made up of hundreds of different chemicals. Some particles, known as *primary particles* are emitted directly from a source, such as construction sites, unpaved roads, fields, smokestacks or fires. Others form in complicated reactions in the atmosphere of chemicals such as sulfur dioxides and nitrogen oxides that are emitted from power plants, industries and automobiles. These particles, known as *secondary particles*, make up most of the fine particle pollution in the country.
- EPA regulates inhalable particles (fine and coarse). Particles larger than 10 micrometers (sand and large dust) are not regulated by EPA.
- **Health:** Particle pollution contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. The size of particles is directly linked to their potential for causing health problems. Small particles less than 10 micrometers in diameter pose the greatest problems, because they can get deep into your lungs, and some may even get into your bloodstream.
- **Visibility:** Fine particles (PM<sub>2.5</sub>) are the main cause of reduced visibility (haze) in parts of the United States, including many of our treasured national parks and wilderness areas.
- **Reducing particle pollution:** EPA's national and regional rules to reduce emissions of pollutants that form particle pollution will help state and local governments meet the Agency's national air quality standards.
- **Health Effects:** Particle pollution - especially fine particles - contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health

AE-18

<sup>29</sup> <http://www.epa.gov/airsceince/air-particulate-matter-image.htm>

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problems. Numerous scientific studies have linked particle pollution exposure to a variety of problems, including:

- premature death in people with heart or lung disease,
- nonfatal heart attacks,
- irregular heartbeat,
- aggravated asthma,
- decreased lung function, and
- Increased respiratory symptoms, such as irritation of the airways, coughing or difficulty breathing.

- People with heart or lung diseases, children and older adults are the most likely to be affected by particle pollution exposure. However, even if you are healthy, you may experience temporary symptoms from exposure to elevated levels of particle pollution. For more information about asthma, visit [www.epa.gov/asthma](http://www.epa.gov/asthma).

- EPA health risk from Airborne particles including dust: Small particles of concern include "fine particles" (such as those found in smoke and haze), which are 2.5 micrometers in diameter or less; and "coarse particles" (such as those found in wind-blown dust), which have diameters between 2.5 and 10 micrometers<sup>30</sup>.

● **COARSE PARTICLES AND HEALTH**

- A particle that is 10 micrometers in diameter is extremely small and can get past the respiratory system's natural defenses (the nose and throat). For comparison, the diameter of an average human hair is about 50-70 micrometers – five to seven times larger than the largest coarse particle.
- Scientific studies have linked exposure to coarse particles to a variety of health problems, including hospital admissions for heart disease, hospital admissions and doctors' visits for respiratory diseases, increased respiratory symptoms in children and premature death in people with heart or lung disease

**Valley Fever: Disease rides the dust of American Southwest<sup>31</sup>**

- Health officials say that in this siege at least 6,000 people statewide have been infected with the fungus found in the arid soils of Central and Southern California, Arizona, New Mexico and Texas. About 50 Californians have died since August 1991. A typical year sees 441 cases and six deaths statewide.
- Most who take ill suffer from flu-like symptoms. But for some, the disease spreads beyond the lungs and can lead to a deadly form of meningitis. A pregnant woman dying of valley fever in Los Angeles was kept alive on a ventilator until doctors could deliver her baby. A doctor at the University of California, Davis, Veterinary Hospital succumbed after performing an autopsy on a horse that carried valley fever.... The fungus that causes valley fever is known by the name *Coccidioides immitis* – or cocci (pronounced "coxy") for short.

AE-18

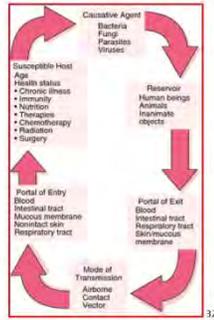
AE-19

<sup>30</sup> <http://www.epa.gov/airquality/particdepollution/pdfs/pm-color.pdf>

<sup>31</sup> [http://articles.baltimoresun.com/1992-12-23/news/1992358125\\_1\\_valley-fever-coccidioides-immitis-fungus](http://articles.baltimoresun.com/1992-12-23/news/1992358125_1_valley-fever-coccidioides-immitis-fungus)

**Response to Comment AE-19**

This comment does not address the adequacy of the Draft EIR. Comment noted.



Comment Letter AE

AE-19

Thank you for consideration of these limited comments. Any errors or omissions are unintentional.

<sup>32</sup> <http://medical-dictionary.thefreedictionary.com/dustborne+infection>



Comment Letter AF

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September 29, 2015

Rebecca Malone  
Associate Planner  
City of San Diego Planning Department  
1222 First Avenue MS 501  
San Diego, CA 92101

Via Electronic Mail  
DCEAS@sanfdgo.gov

Re: City of San Diego Climate Action Plan (CAP), SCH No. 2015021053  
CERF Comments on DEIR and CAP

Dear Ms. Malone:

Please accept the following comments on behalf of our client Coastal Environmental Rights Foundation (CERF), a nonprofit environmental organization established to aggressively advocate, including through litigation, for the protection and enhancement of coastal natural resources and the quality of life for coastal residents.<sup>1</sup>

First, we applaud the City for drafting a Climate Action Plan (CAP) with aggressive goals to achieve greenhouse gas (GHG) reductions that comply with State targets. We also understand the City's desire to streamline California Environmental Quality Act (CEQA) review for projects based on bright-line thresholds. However, as currently drafted, the City's Draft GHG Emissions Screening Criteria (Screening Criteria) potentially undermine the City's GHG reduction goals, the CAP, and the City of Villages planning approach.

As detailed below, the City's Screening Criteria may also result in a significant impact on the environment which has not been addressed in the CAP DEIR. We therefore urge the City to modify the Screening Criteria to further the City's goals and comply with CEQA.

I. The Screening Criteria Are Part of the CAP Project

Admittedly the CEQA Project under review is the City's CAP. However, to achieve the necessary reductions and enable CEQA streamlining, the CAP includes a CAP Consistency Checklist (Checklist). (DEIR, p. 2-18). The DEIR examines both the CAP and the associated Consistency Checklist, but describes the Screening Criteria as a mere "companion document." (DEIR, p. 2-18). However, the Screening Criteria are part and parcel with the CAP and are necessary to reduce the City's GHG emissions and ensure the State reduction goals are met: "The Screening Criteria will be used in conjunction with the City's Climate Action Plan Consistency Checklist to determine if a project has a cumulatively significant impact on greenhouse gas emissions." (Screening Criteria, p. 6).

Because the Screening Criteria are part of the "Project," the City's failure to consider the impacts of the Screening Criteria in the DEIR results in piecemealing. (CEQA Guideline §15378(a) [defining "project" broadly as "whole of an action..."]; see also, *Berkeley Keep Jets Over the Bay*

<sup>1</sup> CERF's comments on a prior version of the Climate Action Plan are attached hereto as Exhibit A. The CAP's water supply analysis continues to rely on outdated water usage metrics and therefore results in artificial GHG reductions. CERF therefore incorporates its prior comments on water supply reductions.

AF-1  
↓

Response to Comment AF-1

Please see Response to Comment N-3

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*Com. v. Board of Port Cmrs.* (2001) 91 Cal.App.4th 1344, 1358, [It is well settled that "CEQA forbids 'piecemeal' review of the significant environmental impacts of a project."]. Both the CAP and the Screening Criteria should therefore be subject to environmental review. (*Sierra Club v. County of San Diego* (2014) 231 Cal.App.4th 1152, 1171-1172).

AF-1

Further, a key CAP project objective is to provide CEQA streamlining for GHG emissions for new developments. (DEIR, p. 2-2). The CAP is meant to serve as a tiering and streamlining document pursuant to CEQA Guideline Section 15183.5. However, as part of the streamlining mechanism, the Screening Criteria were not analyzed in the DEIR:

Through 2020, the CAP meets the requirements set forth in CEQA Guidelines Section 15183.5, whereby a lead agency (e.g. the City of San Diego) may analyze and mitigate the significant effects of GHG emissions at a programmatic level, such as in a general plan, a long range development plan, or a separate plan to reduce GHG emissions. Following adoption of the CAP, eligible individual projects preparing project-specific environmental documents may tier from and/or incorporate by reference the CAP's programmatic review of GHG impacts in their cumulative impacts analysis by using the CAP Compliance Checklist (Appendix A of the CAP) and the GHG Emissions Screening Criteria. (Public Notice, p. 2, emphasis added).

AF-2

CEQA Guideline Section 15183.5 requires more. A qualified Greenhouse Gas Reduction Plan "should" be adopted in a public process following environmental review and may be used for cumulative impacts analysis "once adopted following certification of an EIR..." (CEQA Guideline Section 15183.5(b)(1)(F) and (2)).

Indeed, the City's screening process for new developments shows the significance of the Screening Criteria to the City's evaluation of GHG impacts. First, a project is reviewed pursuant to the Screening Criteria. (Screening Criteria, p. 7). Only if a project is above the thresholds in the Screening Criteria would the project be assessed for CAP consistency through the Checklist. (*Id.*). Therefore, a variety of relatively large and expansive projects – regardless of their location or project-specific elements – would evade CEQA review and would not be evaluated for consistency with the CAP. This is improper. Not only has the impact of such an approach not been subject to CEQA review, it directly undermines the purpose of the CAP as a CEQA streamlining document.

II. The Screening Criteria Use An Improper Methodology

As a companion to the CAP, and as a first step in assessing a Project's cumulative impacts, the Screening Criteria fail to ensure consistency with the CAP. The Screening Criteria thresholds were established by using the Statewide land use emissions and extrapolating the necessary 2020 reduction associated with land use-driven sectors. (Screening Criteria, p. 15). This reduction percentage was then purportedly applied to the City's 2020 projected GHG inventory. (*Id.* at p. 16). However, the Statewide land use-driven sector reductions should not simply be extrapolated to the City. Admittedly, the City's GHG emission sectors do not parallel the State's. (*Id.*, pp. 9-10). For example, the transportation sector accounts for 37 percent of total GHG emissions in the State, while it accounts for considerably more – 54 percent – of the City's emissions. (*Id.*). Thus, the City's land use-driven reductions should likely account for a greater percentage of needed reductions.

AF-3

Further, the Screening Criteria appear to use the City's 2010 baseline emissions instead of the projected 2020 emissions in calculating the necessary land use-driven reductions. (See,

AF-4

Response to Comment AF-2

Please see Response to Comment N-3.

Response to Comment AF-3

Please see Response to Comment N-3.

Response to Comment AF-4

Please see Response to Comment N-3.

Comment Letter AF

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page 3

Screening Criteria, p. 10, Table 2 [13.02 MMT CO2e is 2010 baseline]; compare, *Id.* at p. 20 [13.02 MMT CO2e identified as 2020 forecast emissions]).

After extrapolating the necessary land use-driven reductions, the Screening Criteria apportion the necessary reductions between new and existing development based on the CAP. (*Id.* at p. 20). From there, the Screening Criteria model the number, size, and type of projects necessary to meet the aggregate emission reduction for new development. (*Id.*, p. 22). However, such an approach relies on CAP reduction strategy measures being apportioned to new development without requiring consistency with the CAP until and unless a project exceeds the screening criteria. Moreover, the CAP's goals to focus development in the TPA would be frustrated by the brightline threshold which does not account for a project's location or site-specific constraints.

The Screening Criteria should therefore be amended to require consistency with the CAP first and rely on a threshold derived from the CAP, not piecemealed by using statewide and local figures.

III. In Conjunction with the CAP, the Screening Criteria Must Mitigate Greenhouse Gas Impacts For the General Plan

In 2008, the City updated its General Plan and certified a Program Environmental Impact Report (PEIR) prepared in conjunction with the Plan. In response to public concern regarding the General Plan's contribution to climate change, the City strengthened its GHG mitigation policies in the General Plan itself, and made them enforceable through the Mitigation Monitoring and Reporting Program (MMRP). (Report to City Council February 27, 2008, p. 8; see also, Final PEIR, p. 5-31).

The PEIR itself reiterates the City's commitment: "The overall intent of these new policies is to unequivocally support climate protection actions, while retaining flexibility in the design of implementation measures which could be influenced by technological advances, environmental conditions, state and federal legislation, or other factors." (PEIR, pp. 5-31-32). The City's General Plan Action Plan also includes the short-term action to "expand the scope of the Climate Protection Action Plan to include measures to reduce GHG emissions from the community-at-large;" and the ongoing action of "comprehensively address[ing] climate change through the implementation and actions associated with the individual policies identified in Table CE-1 in the General Plan." (General Plan Action Plan July 2009, pp. 26, 28).

The MMRP likewise outlines mitigation measures for the General Plan impacts to global warming. "The purpose of the MMRP is to ensure that the updated San Diego General Plan... complies with all applicable environmental mitigation requirements." (General Plan MMRP, p. 1, pp. 49-50). The General Plan Monitoring Report likewise states: "The City is in the process of preparing a [CMAP]. The CMAP is a companion document to the General Plan and was prepared in accordance with Policy CE-A.13." (General Plan Monitoring Report, p. 2-4; see also, Report to City Council, July 25, 2013, p. 1 ["The City's General Plan [PEIR MMRP] specifically requires the mitigation of climate change."]). The City committed to preparing a Climate Action Plan that both mitigates the General Plan GHG emissions, and at a minimum, complies with applicable laws. (See CE-A.1, CE-A.2, CE-A.13).

Thus, the CAP serves as mitigation for the General Plan and must meet State reduction targets. Indeed, one of the CAP's objectives is to "[i]mplement climate action policies of the General Plan" and the CAP itself reiterates that it serves as mitigation for the General Plan. (DEIR, p. ES-2; CAP, p. 4). As mitigation for the General Plan, the CAP must be enforceable. "Mitigating conditions are not mere expressions of hope." (*Lincoln Place Tenants Assn. v. City of Los Angeles*, (2005) 130

AF-5

AF-6

Response to Comment AF-5

Please see Response to Comment N-3.

Response to Comment AF-6

Please see Response to Comment N-3.

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Cal. App. 4th 1491, 1508). "When mitigation measures are incorporated in a plan, the agency must take steps to ensure that they will actually be implemented as a condition of later development approved under the plan, 'not merely adopted and then neglected or disregarded.'" (2 Kostka & Zischke, Practice Under the Cal. Environmental Quality Act, §14.16 (rev. 3/13), citing *Federation of Hillside & Canyon Associations v. City of Los Angeles*, (2000) 83 Cal. App. 4th 1252, 1261).

Executive Order S-3-05, issued in 2005, committed the State to reducing its GHG emissions to 1990 levels by 2020, and to 80 percent below 1990 levels by 2050. Consistent with the objective of the Executive Order, the Legislature followed with the Global Warming Solutions Act of 2006, commonly known as AB 32. (Health & Saf. Code, §§ 38500, et seq.). AB 32 requires emission levels be reduced to 1990 levels by 2020. (Health & Saf. Code, § 38550). However, the AB 32 Scoping Plan acknowledges the 2020 goal is an interim step towards the further reductions set out in the Executive Order. Likewise, recently approved Executive Order B-30-15 further established an interim 2030 statewide GHG reduction target of 40 percent below 1990 levels.

Thus, as acknowledged in the CAP and as evidenced by its interim 2035 goal, reduction measures are necessary not only to meet the 2020 goals, but also to continue progress to the ultimate 2050 goal. However, despite the fact that the CAP and the Screening Criteria are meant to function as tiering documents for new development through 2020 only, they frustrate the City's interim goal and the ultimate 2050 goal.

The CAP and Screening Criteria allow development projects approved between now and 2020 (and built beyond 2020) to (1) avoid CEQA review for GHG emission impacts altogether if the project falls below the Screening Criteria thresholds; and (2) only demonstrate consistency with the 2020 target. New development projects undergoing review between now and 2020 will continue to emit GHGs well beyond 2020. Indeed, the Screening Criteria and current GHG emission models amortize construction emissions over an assumed 20-year life of new development projects. Therefore, most – if not all – projects approved using the Screening Criteria as thresholds of significance will continue past the City's interim target without any additional mitigation measures to achieve the necessary additional reductions for 2035 and beyond.

The Screening Criteria therefore undermine the CAP's 2035 target. Further, because the Screening Criteria are designed to help achieve and implement the CAP goals, use of the Screening Criteria will fail to ensure the CAP adequately mitigates GHG impacts of the General Plan.

IV. SANDAG's Regional Plan May Frustrate the CAP

Recent analysis has shown the SANDAG Regional Plan may frustrate the City's CAP GHG reduction goals.<sup>2</sup> Therefore, it is important for the public and decision-makers to know the extent to which the City CAP relies on SANDAG for CAP implementation. This is not clearly articulated in the CAP, though it is clear some reliance on SANDAG is contemplated:

Some of the implementing actions of the CAP may involve other agencies, such as SANDAG, concerning expanded transit service, but such actions will require project-level CEQA evaluation at which time such agencies would be involved as a lead or approving agency." (DEIR, p. 2-19, emphasis added).

"Based on current transit mode share in TPAs, the City planners and transportation engineers we consulted anticipate that by prioritizing these areas for transit

<sup>2</sup>  
<http://www.voiceofsandiego.org/topics/news/morning-report-sandag-transit-plan-could-undercut-the-city/>

AF-6

AF-7

AF-8

AF-9

Response to Comment AF-7

Please see Response to Comment N-3.

Response to Comment AF-8

CAP actions are expected to achieve an increase in commuter transit (peak period) mode share in 2020 and 2035 that will exceed the regionally projected transit mode share for those years. See CAP Appendix pages A-31 through A-35. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

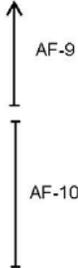
Response to Comment AF-9

Please see Response to Comment AF-8.

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improvements, it will be possible to achieve 12% commuter transit (peak period) mode share in 2020 and 25% commuter transit (peak period) mode share in 2035 in these high density areas. These goals are 4.2% greater than the regionally projected transit mode share for 2020 and 13% greater for 2035." (CAP Appendix B-30)



In light of the gap between SANDAG's projections and the City CAP – and the need to achieve the CAP's 2020 transportation goals before SANDAG approves a new Regional Plan or RTP – the CAP should make clear what agency is responsible for filling this gap. It is clear from these figures that at the very least, SANDAG's approval of a weak Regional Plan will either directly undermine the City's CAP, or compel the City to make substantial improvements to meet the CAP transportation goals despite SANDAG. Under either scenario, SANDAG's role in the CAP should be clearly articulated.

V. Conclusion

CERF urges the City to amend the Draft GHG Screening Criteria to serve as mitigation measure to the General Plan and aid the City in streamlining CEQA review for future development projects. Further, as part of the CAP Project, the Screening Criteria should be analyzed in the DEIR. Should the City fail to make these changes, the CAP and the City's associated environmental review will fail to comply with CEQA.

Thank you in advance for your consideration of our comments.

Sincerely,

COAST LAW GROUP LLP

Marco A. Gonzalez

Livia Borak  
Attorneys for CERF

Enc.: Exhibit A. CERF Comments.CMAP.10.1.2012

Response to Comment AF-10

Please see Response to Comment AF-8.

Comment Letter AG



September 29, 2015

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Via E-mail, to the email shown above

**Subject:** San Diego Climate Action Plan SCH NO. 2015021053, Its Draft PEIR and the Companion Screening Criteria for Greenhouse Gas Emissions Under the California Environmental Quality Act

**Dear Ms. Malone:**

We appreciate the opportunity to communicate with you concerning this important topic. We will primarily restrict our comments to transportation related matters, the adequacy of targets, the adequacy of the explanation of our climate crisis, the adequacy of the explanations of the subject document's transportation-related strategy outcomes, and the basis and conclusions of the screening criteria.

We appreciate the subject's commitment to Community Choice Energy (Community Choice Aggregation), net-zero buildings, and 100% renewable energy by 2035. Still, given the urgency of our climate crisis and the need to set an example for other cities, states, and countries, we will always urge the acceleration of all programs, goals, and achievements in these critical areas. From Reference 1, for California (but in truth this is applicable to all governments, including the government of San Diego):

*Reaching our ultimate objective—reducing California's greenhouse gas emissions to the scientifically recognized level necessary for climate stabilization— will require California to keep building on the framework by continuing to pursue the maximum technologically feasible and cost-effective actions that will steadily drive down greenhouse gas emissions over the coming decades.*

**STATE MANDATE TARGETS SHOWN IN CAP CHAPTER 2, PAGE 21, TABLE 2.1 AND DRAFT PEIR PAGE 2-5, TABLE 2-1 AND THE INADEQUACY OF THE REDUCTIONS CLAIMED**

Table 2.1 (both in the CAP and in the draft PEIR) is correct, for year 2020. It is important to note that it is based on an assumption that the baseline year (2010) value of 13,019,591 must be reduced by 15% to get to the Executive Order S-3-05 (same as AB 32) value, which is the 1990 value of emission level. This is shown as 11,066,652. This is true because 13,019,591 (the baseline year value), multiplied by the factor of 0.85, equals exactly 11,066,652. It is our

AG-1

AG-2

**Response to Comment AG-1**

Comment noted.

**Response to Comment AG-2**

Please see Response to Comment J-1.

Comment Letter AG

understanding that the state allows this convention because many municipalities would not be able to determine their 1990 GHG emission values. However, for 2030, the CAP makes an error, because Executive Order B-30-15 ("B-30-15") requires that the 2030 value be 40% below the 1990 value, not 40% below the baseline value of year 2010.

AG-2

Table 1 of this letter shows all of the factors and all of the emission target values that are important to the question of whether or not the CAP's purported reductions support our state's climate mandates: Executive Order S-3-05 ("S-3-05") and Executive Order B-30-15 ("B-30-15"). The basis for the factors is shown in the Column 5, with additional notes, as needed, shown in Column 6. Both the correct and incorrect calculations are shown, resulting in the CAP's correct 2020 target as well as the CAP's incorrect 2030 target and the CAP's obsolete (because it fails to account for B-3-05) 2035 target. The correct targets for 2030 and 2035 are also shown, including a description of how they are computed. The CAP is unfortunately using the incorrect 2030 value shown in Row 7 and the incorrect 2035 target of Row 12. The incorrect 2035 target value of Row 12 would have been acceptable, before B-30-15, since it is less than the obsolete (pre B-30-15) target value of 2035. However, since B-30-15 now defines the 2030 target value and S-3-05 still defines the 2050 value, there is no basis for not assuming that the correct 2035 target value is not defined by the linear glide path between those points, as shown in Table 1. What matters is the area under the glide paths assumed, because that area is the net CO2 placed into the earth's atmosphere. There is no basis for an assumption that the B-30-15 target would have no effect on the 2035 target.

AG-3

Table 2 of this letter shows emissions and targets, leading to the margin's achieved. Unfortunately, using the claimed or purported emissions after this CAP is executed (Row 5 of Table 2) results in a negative margin, for years 2030 and 2035. Therefore, the CAP and its draft PEIR will need to be amended and reissued to show how positive margins could be achieved. Failing to even achieve the state's climate mandates, when considered in the cumulative impact sense, is to most certainly contribute to the destabilization of the earth's climate. As will be shown, this is an unacceptable outcome. This work will therefore need to be corrected and the subject documents will need to be reintroduced to the review process.

AG-4

Since the 2030 and 2035 margins are negative, this means that the CAP results will interfere with and not support the achievement of S-3-05 and B-30-15. This also means that the GHG Section on Page ES-8 of the PEIR is incorrect. The adoption of this CAP will allow developments to go forward, increasing GHG, even though the CAP is known to fail to support S-3-05 and B-30-15. The GHG section shown on that Page ES-8 needs to show the need for additional mitigations and that the level of significance exceeds any reasonable, science-based threshold. This is the opposite of what is currently shown.

AG-5

**THE DEFINITION OF CLIMATE DESTABILIZATION, THE OMISSION OF THIS DEFINITION IN THE SUBJECT DOCUMENTS, AND WHY THIS OMISSION VIOLATES CEQA LAW**

CEQA law requires that negative impacts be considered. Climate destabilization is a negative impact that could occur, given cumulative effects, if the subject documents fail to produce sufficient reductions in greenhouse gas (GHG) emissions. **Since climate destabilization must be considered, it must be defined.** To define climate destabilization, the essence of our climate crisis must be explained. The subject documents have material on legislative background related to our climate crisis. However, that material falls far short of what decision-makers and members of the public need to know in considering the adequacy of the proposed actions.

AG-6

**Response to Comment AG-3**

Please see Response to Comment J-1.

**Response to Comment AG-4**

Please see Responses to Comment J-1.

**Response to Comment AG-5**

Please see Responses to Comment J-1.

**Response to Comment AG-6**

Please see Response to Comment AG-8.

## Comment Letter AG

**Table 1** Factors Based on S-3-05, B-30-15, and the Calculation of the State's Climate Mandated Targets, Using the 2010 Baseline and the Assumption that the 1990 Level (Which is the 2020 Target) is 15% Less than the 2010 Baseline

Row	Name	Value	Computed As	Basis	Note
1	Factor 1	0.85	The 1990 value is 15% less than the 2010 Baseline Value	Assumption	The state allows this, since 1990 values may not be available.
2	Factor 2	0.6	The 2030 value is 40% less than the 1990 value, which is the 2020 Target	EO B-30-15	This takes precedent over EO S-3-05.
3	Factor 3	0.6	The 2035 value is 40% less than the 1990 value (2020 Target)	Linear Glide Path of EO S-3-05	This is now obsolete, due to EO B-30-15
4	Factor 4	0.2	The 2050 value is 80% less than the 1990 value (2020 Target)	EO S-3-05	It was hoped that this would support capping earth's atmospheric CO2e
5	Baseline	<b>13,019,591</b>	San Diego's 2010 emission	Inventory for 2010	None
6	Correct 2020 Target	<b>11,066,652</b>	1990 Level, Which is Baseline Multiplied by Factor 1	Computed as Described	None
7	Incorrect 2030 Target	7,811,755	The Baseline Multiplied by Factor 2	Computed as Described	None
8	Correct 2030 Target	<b>6,639,991</b>	The 2020 Target Multiplied by Factor 2	Computed as Described	None
9	Correct 2050 Target	2,213,330	The 2020 Target Multiplied by Factor 4	Computed as Described	None
10	Correct 2035 Target	<b>5,533,326</b>	The 2030 Value, Reduced by 25% of the Difference Between the 2030 Value & the 2050 Value	Computed as Described, which is a linear interpolation	This assumes a linear glide path between 2030 and 2050
11	Obsolete 2035 Target	6,639,991	The 2020 Target Multiplied by Factor 3	Computed as Described	This was correct before EO B-30-15.
12	Incorrect 2035 Target	6,509,796	The Baseline Multiplied by 0.50	Computed as Described	This was nearly correct, before EO B-30-15

Comment Letter AG

**Table 2 Emission Values, State Mandated Targets (Both Correct and Incorrect), and Margins (Both Correct and Incorrect)**

Row	Value Being Computed	Year		
		2020	2030	2035
1	2010 Baseline	13,019,591	13,019,591	13,019,591
2	Total Projected Emissions (BAU)	14,067,316	15,667,499	16,427,118
3	State Target Levels. However, the 2030 and 2035 are incorrect.	11,066,652	7,811,755	6,509,796
4	Reductions needed (but 2030 and 2035 are incorrect) These are Row 2 minus Row 3.	3,000,664	7,855,744	9,917,323
5	Total CO <sub>2</sub> e Emissions. These values are typed in from Table 2.1 of the CAP.	9,791,894	7,635,226	6,382,661
6	Margins, or what Table 2.1 describes as "Additional Reductions Below State Targets." They are computed as Row 3 minus Row 5. However, the 2030 and the 2035 values are incorrect.	1,274,758	176,529	127,135
7	State Target Levels. These values are correct. They are taken from Rows 6, 8 and 10 in Table 1 of this letter.	11,066,652	6,639,991	5,533,326
8	Reductions needed. The 2030 and 2035 values are correct. These are Row 2 minus Row 7.	3,000,664	9,027,508	10,893,792
9	Margins, or what Table 2.1 describes as "Additional Reductions Below State Targets." They are computed as Row 7 minus Row 5.	1,274,758	-995,235	-349,335

**Climate Change Background**

**Basic Cause**

Our climate crisis exists primarily because of these two facts<sup>2</sup>: First, our combustion of fossil fuels has added and continues to add "great quantities" of carbon dioxide (CO<sub>2</sub>) to our atmosphere. Second, atmospheric CO<sub>2</sub> traps heat.

AG-7

**California's First Two Climate Mandates**

California's Governor's Executive Order S-3-05 is similar to the Kyoto Agreement and is based on the greenhouse gas (GHG) reductions recommended by climate scientists for industrialized nations, back in 2005<sup>3</sup>. In 2005, climate scientists believed that the reduction-targets of S-3-05 would be sufficient to support stabilizing Earth's climate at a livable level, with a reasonably high level of certainty. More specifically, this executive order aims for an average, over-the-year and over the earth, atmospheric temperature

AG-8

**Response to Comment AG-7**

Comment noted.

**Response to Comment AG-8**

The comment appears to suggest reduction targets that go beyond statewide reductions. As shown on CAP page 21, the CAP provides for reductions that exceed these statewide reduction targets. Specifically, the CAP provides for an additional 1,243,500 MT CO<sub>2</sub>e in greenhouse gas reductions by 2020, 211,196 MT CO<sub>2</sub>e in greenhouse gas emissions reductions by 2030 and 205,462 MT CO<sub>2</sub>e in greenhouse gas emissions reductions by 2035.

**Comment Letter AG**

rise of "only" 2 degree Celsius, above the preindustrial temperature. It attempts to do this by limiting atmospheric CO2 and other GHG denoted as "CO2e", which includes other GHG besides CO2 which has been converted to the units of carbon dioxide equivalency so they can be added to CO2, which is herein represented as "CO2e", to 450 PPM by 2050<sup>3</sup>. To be clear, the S-3-05 targets were thought to be sufficient to cap atmospheric CO2e to 450 PPM by year 2050<sup>3</sup>. This "capping" requires that a CO2e equilibrium equation be true. This equation is shown in the subsection below, *The Primary Threat of our Climate Crisis*. The S-3-05 emission targets are as follows: 2000 emission levels by 2010, 1990 levels by 2020, and 80% below 1990 levels by 2050.

As shown in Reference 3, with the use of its references, it was thought that if the world achieved S-3-05, there would be a 50% chance that the maximum temperature rise will be less than 2 degrees Celsius, thus leaving a 50% chance that it would be larger than 2 degrees Celsius. A 2 degree increase would put over a billion people on the planet into a condition described as "water stress" and it would mean a loss of 97% of our coral reefs.

There would also be a 30% chance that the temperature increase would be greater than 3 degrees Celsius. A temperature change of 3 degrees Celsius is described in Reference 3 as being "exponentially worse" than a 2 degree Celsius increase.

The second California climate mandate is AB 32, the so-called *Global Warming Solutions Act of 2006*. It includes provisions for a cap and trade program, to ensure meeting S-3-05's 2020 target of the 1990 level of emissions. It continues after 2020. AB 32 requires CARB to implement measures that achieve the maximum *technologically feasible and cost-effective* (words taken from AB 32) greenhouse-gas-emission reductions.

California is on track to achieve its second (2020) target. However, the world emission levels have, for most years, been increasing, contrary to the S-3-05 trajectory. Because the world has effectively failed to achieve S-3-05, California, if it still is interested in leading the way to human survival, must do far better than S-3-05, going forward.

**California's More Recent Climate Mandate**

Governor's Executive Order B-30-15 requires a single target: 40% below the 1990 level by 2030. Note that this target level is halfway between Executive Order S-3-05's 2020 target (which is equal to our 1990 emission level) and Executive Order S-3-05's 2050 target (80% below the 1990 level.) However, the 2030 target year is 5 years sooner than the halfway point between 2020 and 2050, which is 2035. This suggests that our Governor knows that the S-3-05 straight-line trajectory is not enough to stabilize the climate. These two governor's executive orders will be referred to as S-3-05 and B-30-15.

**Failing to Achieve these Climate Mandates**

If we fail to achieve S-3-05 and/or B-30-15, or if we achieve them but they turn out to be too little too late and other states and countries follow our example, the result will be catastrophic for most life forms on earth, including our own species.

It has been written<sup>4</sup> that, "A recent string of reports from impeccable mainstream institutions-the International Energy Agency, the World Bank, the accounting firm of PricewaterhouseCoopers-have warned that the Earth is on a trajectory to warm by at



AG-8

AG-9

AG-10

**Response to Comment AG-9**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment AG-10**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please also see Response to Comment AG-8.

Comment Letter AG

least 4 Degrees Celsius and that this would be incompatible with continued human survival."

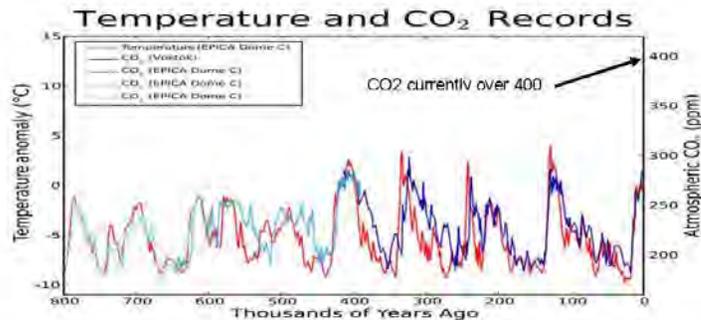
It has also been written<sup>5</sup> that, "Lags in the replacement of fossil-fuel use by clean energy use have put the world on a pace for 6 degree Celsius by the end of this century. Such a large temperature rise occurred 250 million years ago and extinguished 90 percent of the life on Earth. The current rise is of the same magnitude but is occurring faster."

**Pictures Showing Our Predicament**

Figure 1 shows (1) atmospheric CO<sub>2</sub> (in blue) and (2) averaged-over-a-year-then-averaged-over-the-surface-of-the-earth, world atmospheric temperature (in red). This temperature is with respect to a recent preindustrial value. The data starts 800,000 years ago. It shows that the current value of atmospheric CO<sub>2</sub>, which is now over 400 PPM, far exceeds the values of the last 800,000 years.

Figure 2 shows the average yearly temperature with respect to the 1960-to-1990 baseline temperature (in blue). It also shows atmospheric levels of CO<sub>2</sub> (in red). The S-3-05 goal of 450 PPM (the intended maximum value) is literally "off the chart", in Figure 2. Figure 2 shows that, as expected, temperatures are starting to rise along with the increasing levels of CO<sub>2</sub>. The large variations in temperature are primarily due to the random nature of solar energy being received by the earth. The rapid increase of atmospheric CO<sub>2</sub> from our 180-year-old industrial revolution is obvious

Figure 1 Atmospheric CO<sub>2</sub> and Mean Temperature from 800,000 Years Ago



**Primary Threat of Our Climate Crisis: Climate Destabilization**

The primary threat of our climate crisis is that current and future, world-wide, yearly emission levels of CO<sub>2</sub>e will put our planet into a condition which is best described as "climate destabilization". This is a condition in which the climate system's positive

AG-10

AG-11

AG-12

**Response to Comment AG-11**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please also see Response to Comment AG-8.

**Response to Comment AG-12**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please also see Response to Comment AG-8.

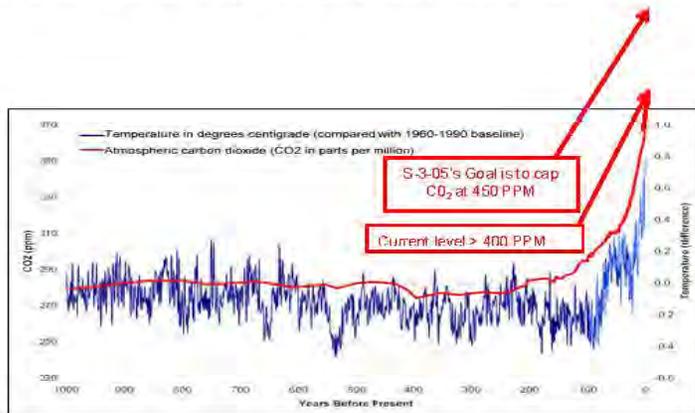
Comment Letter AG

feedbacks<sup>1</sup> become large enough to, even if we were to eliminate our CO<sub>2</sub>e emissions, overwhelm the processes that remove carbon dioxide equivalent (CO<sub>2</sub>e) gases from the earth's atmosphere, primarily the carbon sequestration of carbon dioxide (CO<sub>2</sub>) performed by the photosynthesis of plant growth. "Climate destabilization" is also described as "going past the climate tipping point" and also sometimes described as "going over the climate cliff", or having "runaway climate change". It is best understood by an equation for the equilibrium of atmospheric CO<sub>2</sub>e, mentioned above in the section titled *California's First Two Climate Mandates*. The following definitions are used:

- E<sub>a</sub> is the anthropogenic (cause by human activity) emission of CO<sub>2</sub>e, primarily caused by the combustion of fossil fuels.
- E<sub>n</sub> is the emission of CO<sub>2</sub>e from natural processes, such as respiration, digestion, decomposition of plant material, and fire.
- E<sub>ptb</sub> is the "positive feedback" emission of CO<sub>2</sub>e, which is an emission or emissions being caused by the earth's warming, such as the melting of our permafrost, releasing methane, which is a CO<sub>2</sub>e gas
- S is the sequestration of carbon, or the removal of CO<sub>2</sub>e from the atmosphere, from all processes but primarily from the photosynthesis of growing plants.

Equation 1:  $E_a + E_n + E_{ptb} = S$

Figure 2 Atmospheric CO<sub>2</sub> and Mean Temperature Over the Last 1,000 Years



<sup>1</sup> If a process ("Process 1") sets in motion a second process ("Process 2") and if the second process (Process 2) adds to the first process (Process 1), then, the second process (Process 2) is said to be a "positive feedback" to the first process (Process 1).

AG-12

Comment Letter AG

When Equation 1 is true, that is, when the two sides of the equation are precisely equal, the atmospheric CO<sub>2e</sub> is neither going up nor going down. The hope of S-3-05 was that this condition would be met in 2050 and that the atmospheric CO<sub>2e</sub> would be at 450 PPM<sup>3</sup>. The level of our emissions, mostly CO<sub>2</sub> from the combustion of fossil fuel, was to have been at 80% below our 1990 level in 2050. If it is assumed that back in 2005 it was thought that the positive feedback term could be ignored, this means that the 2050 S-3-05 target (80% below the 1990 level) is equal to the natural removal of CO<sub>2e</sub> (the "S" term) minus the natural addition of CO<sub>2e</sub> (the E<sub>n</sub> term). Of course if we want to bring the earth's temperature back down, what needs to happen is for the anthropogenic term to be small enough that the left side of the equation is smaller than the sequestration term, "S", creating a negative slope to the quantity of atmospheric CO<sub>2e</sub>. This will still not guarantee that we can achieve climate stabilization because, at any time, the positive feedback term could increase to be larger than the sequestration term, "S" minus the natural emissions term, E<sub>n</sub>. If this were to happen, it would be "game over", unless we can figure out a way to take CO<sub>2e</sub> out of the atmosphere. We are in no position to assume some successful geoengineering solution.

**Latest Official State Information on Climate Destabilization**

What we need to achieve is the opposite of climate destabilization. We need to "stabilize the climate at a livable level". This will be referred to as "climate stabilization". It would start with stabilizing the atmospheric level of CO<sub>2e</sub>. It would also require the atmospheric level of CO<sub>2e</sub> coming down to a safe level, considering the threat of positive feedbacks becoming dangerously high.

The following revealing quotes (Quote 1 through Quote 4), come from Reference 1's Section B, *Achieving Climate Stabilization*. Even though the goal of S-3-05 was to support a world effort to aim at a 2 Degree Celsius change in temperature (achieving a 50% probability of keeping that temperature change below 2 Degrees but leaving a 50% probability of exceeding 2 degrees), there is this quote (emphasis added):

Quote 1:

*Scientific research indicates that an increase in the global average temperature of 2°C (3.6°F) above pre-industrial levels, which is only 1.1°C (2.0°F) above present levels, poses severe risks to natural systems and human health and well-being*

As stated in this letter and in Reference 3, the method of aiming for a 2 Degree Celsius change (achieving a 50% probability of keeping the temperature change below 2 Degrees but leaving a 50% probability of exceeding 2 degrees) is to cap the atmospheric CO<sub>2e</sub> at 450 PPM by 2050. This concept is reinforced in this quote:

Quote 2:

*To have a good chance (not a guarantee) of avoiding temperatures above those levels, studies focused on a goal of stabilizing the concentration of heat-trapping gases in the atmosphere at or below the 450 parts per million (ppm) CO<sub>2</sub>-equivalent (CO<sub>2e</sub>, a metric that combines the climate impact of all well-mixed GHGs, such as methane and nitrous oxide, in terms of CO<sub>2</sub>).*

However, Reference 1 also contains these rather alarming words (emphasis added):

Quote 3:

AG-12

AG-13

**Response to Comment AG-13**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please also see Response to Comment AG-8.

Comment Letter AG

*The CO2e target is a somewhat approximate threshold, and the exact level of CO2e is not precisely known because the sensitivity of the climate system to GHGs has uncertainty. Different models show slightly different outcomes within this range. An example of a pre-IPCC assessment study (Meinshausen et al. 2009) which has synthesized many studies on climate sensitivities, concluded that we would need to stabilize at about 400 ppm CO2e in order to likely avoid exceeding the 2°C threshold (even at that stabilization target, there is still about a 20 percent chance of exceeding the temperature target).*

The problem with stabilizing at 400 PPM CO2e is that, as shown in Figures 2 and 3, the earth's current value is already above that level and the world has no plan to achieve the emission rate of 80% below the 1990 level anytime soon (if at all), which would give us a chance to cap the value.

Given all this, the following quote shows the desperate nature of our current predicament and the urgent need to do all measures that are technologically feasible and cost effective, as soon as possible:

Quote4:

*Further, a recent paper by an international team of scientists (Hansen et al. 2013)<sup>16</sup> asserts that the widely accepted target of limiting human-made global climate warming to 2°C above preindustrial levels is likely too high and may subject future generations and nature to irreparable harm. Recognizing this fact, the international community agreed in meetings in Cancun in 2012 to review, by 2015, progress to the 2°C target and consider whether it should be strengthened to a 1.5°C threshold.*

**Conclusion**

The conclusion is that we have nothing under control and there is no valid scientific basis for such things as a "screening criteria" a "significance threshold", or a "threshold of significance", when it comes to GHG emissions. We are left with a fundamental principle of CEQA: for all projects (plans and developments), all feasible mitigation measures must be adopted.

**THE STRATEGY-3, DRIVING-RELATED DESCRIPTIONS; OF HOW IT IS ASSUMED (OR DETERMINED); THAT SOME PERCENT WILL USE TRANSIT, WALK, OR BIKE AND THE DISTANCES THAT APPLY; FALL SHORT OF WHAT IS NEEDED TO ALLOW A READER TO JUDGE THE VALIDITY OF THE CLAIMED REDUCTIONS OR TO UNDERSTAND WHAT ENFORCEABLE MEASURES AND/OR FUNDING MIGHT IMPLEMENT THEM**

Although Page 2-4 of the Draft PEIR says that the CAP's Appendix C.1 contains the methods for estimating GHG reductions, in fact they are in the CAP's Appendix B. We appreciate Appendix B for its explanation of its calculation-related assumptions and its methods. We checked the key work using the parameters and methodology given in Appendix B by putting them into an EXCEL spreadsheet we constructed, as shown in Table 3.

However, the justification and background information used to obtain the distances involved and the percentages of commuters who will use transit, walk, or bike are often too vague or without any detail or rationale given.

AG-14

AG-15

AG-16

**Response to Comment AG-14**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please also see Response to Comment AG-8.

**Response to Comment AG-15**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please also see Response to Comment AG-8. Regarding the CAP Consistency Checklist and greenhouse gas emissions significance threshold, please see Response to Comment N-3.

**Response to Comment AG-16**

The reference to the correct Appendix in the CAP is included in the Final EIR. Regarding the reductions for CAP Actions under Strategy 3, please see Response to Comment AF-8. Please see also Responses to Comments AG-17 through AG-21 below.

Comment Letter AG

**Action 3-1. Transit**

For example, near the top of Page B-30 it is written that SANDAG expects certain transit ridership by "providing incentives". However, there is no example given of what an incentive might be. Generally speaking, driving and parking are heavily subsidized and the parking subsidy results in reduced wages, increased rent, and increased costs. Policies to improve the way we pay for roads and parking might make more sense than "providing incentives", whatever that might mean. The City has a responsibility to convey this information, about how driving and parking are subsidized, to SANDAG.

The other explanation is that some information in the City of San Diego Planning Department's *Pedestrian Mobility Plan* somehow supports some "City planners and transportation engineers" to "anticipate" that by "prioritizing these areas for transit improvements", it would be possible to achieve a 12% commuter transit (peak period) mode share in 2020 and a 25% value for 2035. However, it is not stated what these transit improvements would be, that would be beyond what SANDAG is already funding as they assume that the 2020 value is 7.8% and the 2035 value is only 10.1%. It may be that the difference is that the SANDAG values are for the region and the Transit Priority Areas (TPAs) are going to be higher, for that reason. But that is not what is stated. Since the 12% and the 25% values are the key values driving the result, there should be more said about why they might be correct.

AG-17

**Table 3 Results of an EXCEL Worksheet Check of the Methods And Parameters Given in Appendix B of the CAP**

<b>Transit</b>								
Year	Labor Force in TPA's	Transit Mode Share in TPAs	TPA Commuters Using Transit	Commute Distance (Miles)	VMT/Year 255 Work Days per Year	Grams Per Mile	Grams	GHG Reduction MT
2020	433,128	12%	51,975	25	331,342,920	360	119,283,451,200	119,283
2035	482,540	25%	120,635	25	769,048,125	275	211,488,234,375	211,488
<b>Walk</b>								
Year	Labor Force in TPA's	Walk Mode Share in TPAs	TPA Commuters Using Walk	Commute Distance (Miles)	VMT/Year 255 Work Days per Year	Grams Per Mile	Grams	GHG Reduction MT
2020	433,128	4.1%	17,758	0.67	3,033,997	360	1,092,238,801	1,092
2035	482,540	6.5%	31,365	0.67	5,358,727	275	1,473,650,017	1,474
<b>Bike</b>								
Year	Labor Force in TPA's	Walk Mode Share in TPAs	TPA Commuters Using Bike	Commute Distance (Miles)	VMT/Year 255 Work Days per Year	Grams Per Mile	Grams	GHG Reduction MT
2020	433,128	6.0%	25,988	8	53,014,867	360	19,085,352,192	19,085
2035	482,540	18.5%	89,270	8	182,110,596	275	50,080,413,900	50,080

**Response to Comment AG-17**

Please see Response to Comment AG-8. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Comment Letter AG

**Action 3-2, Commuter Walking**

For walking it is stated at the top of Page B-32 that SD Pedestrian Master Plan of 2006 provides estimates for walking in the various Community Planning Areas of the City. It is then stated that it is assumed that the mode will increase from 3.46% to 4.1% in 2020 and 6.5% in 2035 in TPAs. However, there is no reason given to expect these increases. The important assumption of the average walk distance of 0.67 miles is made based on an email from someone who works at SANDAG, named Mike Calandra. The email was sent on January 9<sup>th</sup>, 2015. We don't know what was written in the email.

AG-18

**Action 3-3, Commuter Bicycling**

For biking, it says that the SD Bike Master Plan predicts, for no stated reason, that biking will increase by 279% (increase by a factor of 3.79) by 2022, with no reference year given. Therefore, it is stated that it is assumed that biking will increase from 2% to 6% (a 200% increase or an increase by a factor of 3) by 2020 and then do this again in the next 15 years. There is nothing written about the all-important assumption of an 8 mile round-trip.

AG-19

**Action 3-6, Reduction in Commute Miles**

On page B-36 the assumption is used that the average round-trip commute distance would drop from 25 mile to 23 miles. This is based on some unspecified "planning efforts" to densify the urban environment. We support this idea but we would like to see some plan to ensure that this will happen. Zoning changes are subject to political will.

AG-20

**Overview of "Actions 3-n"**

One thing that should be shown is the information in Table 4. This gives the reader an idea of how strict the criteria are for what constitutes a Transit Priority Area (TPA). We suspect that most San Diego workers drive to work to find a free surface parking lot and poor transit service. The percentage of this across the County would be worse. San Diego needs to adopt policies that will help other municipalities that have less clustering, less density, and worse transit to also reduce driving. The CAP draft needs to be rewritten with this feature. More specifically, it needs policies to reduce driving in both the TPAs and the developments that are not in TPAs. It needs to include commitments to lobby SANDAG and the state of California to adopt policies that will address driving in the urban sprawl which includes most of San Diego and certainly most of San Diego County. This must include improvements to how we pay for driving and parking. What are the values that are not shown in Table 4? More specifically what number of employees in San Diego suffer a reduced paycheck so that their company can offer what many think is "free" parking?

AG-21

**Table 4** Percent of San Diego Workers in PDAs and with "Free" Parking

Year	Workers	In TPA's		Abused by Bundled-Cost ("Free") Parking	
		Number	Percent	Number	Percent
2020	504,178	433,128	85.9%	?	?
2035	569,416	482,540	84.7%	?	?

**Response to Comment AG-18**

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting. The referenced email referred to by the commenter is on file with the City's Planning Department.

**Response to Comment AG-19**

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting. The commenter references an assumption of an 8-mile roundtrip walking commute distance. The CAP did not make such an assumption. See CAP Appendix page A-33 which shows an assumed round-trip commute distance of 0.67 miles.

**Response to Comment AG-20**

Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment AG-21**

Comment noted. The TPA is shown in CAP Appendix B.

Comment Letter AG

**Strategy 3 Overview**

We find it unacceptable and in violation of CEQA law that there are not better explanations and plans shown to achieve these assumptions about the number of people that will use transit, walking, and biking.

One important source of GHG reduction strategies that was overlooked is shown in Reference 6. It contains a number of strategies with associated GHG reduction estimates.

For example, in the *Transportation Section* of its Chapter 7, it says (Section 3.3.2):

3.3.2 Unbundle Parking Costs from Property Cost

**Range of Effectiveness:** 2.6 – 13% vehicles miles traveled (VMT) reduction and therefore 2.6 – 13% reduction in GHG emissions.

**Measure Description:**

This project will unbundle parking costs from property costs. Unbundling separates parking from property costs, requiring those who wish to purchase parking spaces to do so at an additional cost from the property cost. This removes the burden from those who do not wish to utilize a parking space. Parking will be priced separately from home rents/purchase prices or office leases. An assumption is made that the parking costs are passed through to the vehicle owners/drivers utilizing the parking spaces.

However, forcing someone who owns an office with associated parking to operate the parking as a separate business may not be the best way to solve this problem because the landowner may not reduce the rent on the building enough and furthermore, the tenant company leasing the building may not pass along enough of the rent savings to the workers. The scheme therefore lacks transparency for the workers and for the general public. We need a simple, transparent system that mitigates the full damage done by bundled-cost parking. It needs to put workers economic rights first. It need to show the workers exactly what is going on. It needs to protect low income workers that must keep driving. It must deliver significant reductions in driving. All of this can be done, as shown in the next section. Under CEQA it is illegal to ignore feasible mitigation.

In our court case against the County's deficient Climate Action Plan, an Appellate Court Justice, after asking for an example of a feasible mitigation measure that was ignored and after then being informed of this program, stated, "that sounds like feasible mitigation to me."

**OVERLOOKING THE HIGH-POTENTIAL MEASURE OF IMPROVING THE WAY WE PAY FOR PARKING, ESPECIALLY AT WORK LOCATIONS**

**Our Previous Attempts to Inform the City About Parking**

In numerous communications, over the years, we have tried to interest the City in getting serious about a car-parking policy that would improve the way we pay for parking.

We received the following response after writing a rather detailed email about a better way for workers to be treated, regarding their employee parking, whereby their parking is operated as a business, with all the earnings going to the workers.

AG-22

AG-23

**Response to Comment AG-22**

Comment noted. Implementation of the CAP would result in less than significant greenhouse gas emissions impacts as analyzed in Draft EIR Section 3.D.

**Response to Comment AG-23**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Comment Letter AG

**From:** Pratt, Linda Giannelli [mailto:LPratt@sandiego.gov]  
**Sent:** Monday, December 19, 2011 9:08 AM  
**To:** Mike  
**Subject:** RE: Regarding SD's C-MAP's Approach to Parking Policy

Great comments, Mike, and I can see how your proposal may be a better approach. I will check with our team and see how this works with the Development Services Dept.

Thanks again very much!

Linda  
 Linda Giannelli Pratt  
 Chief Program Manager  
 City of San Diego Environmental Services Department  
 office 858-492-5088 cell 858-518-7834  
[LPratt@SanDiego.gov](mailto:LPratt@SanDiego.gov)  
 9601 Ridgehaven Court, suite 310  
 San Diego, CA 92123-1636

We also sent Reference 7 and then Reference 8, which both contained information about car parking. As near as we can tell, we were ignored both times.

**Subject Documents' (Draft CAP, Draft PEIR, Screening Criteria, including all Appendices of all three documents) Statements about Car Parking Policy Improvements and Why These Statements Are Insufficient, Under CEQA**

The CAP, on Page 25 (emphasis added):

**Land Use**

Transportation strategies cover a broad range of activities that aim to reduce vehicle miles travelled (VMTs), improve mobility, and enhance vehicle fuel efficiency. Specific implementation measures involve changing land uses, adopting a new perspective on community design, promoting alternative modes of travel, **revising parking standards, and managing parking.**

This level of detail is unacceptable.

The CAP, on Page 39 (emphasis added and note that these measures, while being, for the most part, only vague promises, and thus far from having the *enforceable* characteristic required, do have the potential to reduce driving if they were properly developed, and so we would love to help to develop them into enforceable measures.):

**SUPPORTING MEASURES FOR BICYCLING, WALKING, TRANSIT & LAND USE:**

- Implement bicycle improvements concurrent with street re-surfacing projects, including lane diets, green bike lanes, sharrows, and buffered bike lanes.



**Response to Comment AG-24**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Comment Letter AG

- Implement a bicycle sharing program with DecoBikes. Reduce the “1 mile” barrier gap by ensuring that further expansion of the bike share program is designed and implemented to reduce the distance needed to travel between transit stops and destinations.
- Identify and address gaps in the City’s pedestrian network and opportunities for improved pedestrian crossings, using the City’s Pedestrian Master Plan and the City’s sidewalk assessment.
- Adopt City portions of SANDAG’s forthcoming first mile/last mile initiative and incorporate Safe Routes to Transit strategies in Transit Priority Areas.
- Coordinate pedestrian counting programs with SANDAG and SDSU Active Transportation Research Programs.
- **Develop a Parking Plan to include measures such as “unbundled parking” for nonresidential and residential sectors in urban areas.**

AG-24

We notice that this wording makes no specific commitment. Also, we actually don’t know what “unbundled parking” is. We do know what *unbundling the cost of parking* means. What is the City’s understanding of what it means to unbundle the cost of parking? How would you describe a system that mitigates the harm of bundled-cost parking?

The draft PEIR on Page 2012 (emphasis added and removing Actions 3.1 through 3.5, since they have no mention of parking):

**Strategy 3: Bicycling, Walking, Transit & Land Use**

As stated in the CAP, the goals for Strategy 3, Bicycling, Walking, Transit and Land Use, are to increase the use of mass transit, increase commuter walking and bicycling opportunities, and promote the effective land use to reduce vehicle miles traveled. Proposed actions to implement this strategy include the following:

**Action 3.6:** Implement transit-oriented development within TPAs. The target for Action 3.6 is to reduce average vehicle commute distance by two miles through implementation of the General Plan’s City of Villages Strategy by 2035. Similar to Action 3.1, this action would facilitate the implementation of the City of Villages Strategy, which would result in the concentration of new development in TPAs. The CAP includes several supporting measures for Strategy 3, Bicycling, Walking, Transit and Land Use:

AG-25

- Implement bicycle improvements concurrent with street re-surfacing projects, including lane diets, green bike lanes, sharrows, and buffered bike lanes.
- Implement a bicycle sharing program with DecoBikes. Reduce the “1 mile” barrier gap by ensuring that further expansion of the bike share program is designed and implemented to reduce the distance needed to travel between transit stops and destinations.
- Identify and address gaps in the City’s pedestrian network and opportunities for improved pedestrian crossings, using the City’s Pedestrian Master Plan and the City’s sidewalk assessment.
- Adopt City portions of SANDAG’s forthcoming first mile/last mile initiative and incorporate Safe Routes to Transit strategies in TPAs.
- Coordinate pedestrian counting programs with SANDAG and SDSU Active Transportation Research Programs.

**Response to Comment AG-25**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

Comment Letter AG

- **Develop a Parking Plan to include measures such as “unbundled parking” for nonresidential and residential sectors in urban areas.**

Again, there is no commitment here, since the words “such as” could allow just about anything. This is certainly lacking any detail. It does not even let the reader know what “unbundled parking” is and it does not give an informed reader any confidence that the City knows what “unbundled parking” is or, more to the point here, what it means to bundle the cost of parking or how to implement a policy that would mitigate the harm caused by the baseline policy of

- Bundling the cost of parking and then
- Letting everyone think that the parking is “free”.

What is needed is a parking-policy improvement that is meaningful and enforceable, as was established in the court case against the County’s Climate Action Plan.

**The High Frequency of Bundled-Cost (“Free”) Parking**

UCLA Professor Donald Shoup (now retired), a well-known economist and author (*The High Cost of Free Parking*) has written that 99% of car trips in the United State end in what is known as “free” parking. Generally speaking, parking is expensive to provide and so of course someone is paying for all of the so-called “free” parking. Professor Shoup has written that the yearly subsidy made to car parking is about equal to our nation’s defense budget.

We need to know the frequency of bundled-cost (“free”) parking in both the City of San Diego (the City’s primary responsibility) and in San Diego County (San Diego’s secondary responsibility, since the City has 40 of the 100 weighted SANDAG votes.) This is why the Table 4 values need to be filled in, with more columns added to cover the employees both in and out of TPAs and the number of employees in San Diego County that suffer the abuse of bundled-cost parking. We suspect that a very high percentage of the car-parking facilities in San Diego are operated as bundled-cost parking and that this is especially true in the suburban areas of San Diego, where the per-capita vehicle-miles travelled (VMT) is higher than the city average.

**A Car-Parking System that Will Mitigate the Harm Caused by Bundled-Cost Parking**

This report, <http://www.sandiego.gov/environmental-services/pdf/sustainable/parkingcosts.pdf>, which was peer-reviewed by the Air and Waste Management Association (AWMA), describes a system that is applicable to nearly all types of parking. It is included here as Reference 9. The City needs to fully understand Reference 9 and decide if it describes a system that should be widely implemented throughout San Diego. It could be argued that wherever a parking operation is its own, for-profit business, there is no need for change. However, there are advantages to the Reference 9 system that go beyond just fair pricing, economic justice for those that might like to drive less than average, and reducing the choice of driving. One thing the CAP does not talk about is the VMT resulting from drivers that are driving around looking for parking. This significant problem is addressed in Reference 9 and, in fact, it is solved, or eliminated, for any driver with a GPS. This is because the private sector will create software that will utilize the system-generated data to guide a driver to the best available parking spot that meets the driver’s cost and location requests.



AG-25

AG-26

**Response to Comment AG-26**

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter AG

Although the Reference system is an optimum, overall system, it cannot be implemented until demonstration projects show that a simplified version can be implemented and will please all of the stakeholders. Reference 10 describes a system that could be installed at a worksite; Reference 11, at a school site.

For convenience and to provide the gist of the operation of the worksite demonstration, the following words, from the Introduction of Reference 10, are brought into this letter as follows:

This paper describes a parking policy that distributes the benefit of parking to all employees, regardless of how often they choose to drive. It does this by

- Charging a fair price for the parking, per unit of time parked, and by
- Giving the total earnings (*total parking-lot earnings*) to the employees, such that each employee's share of the *total parking-lot earnings* is proportion to the time they spend at the work site served by the parking.

The following, additional, optional action would guarantee that no driver loses money under the policy:

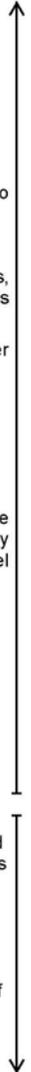
- Adding a *must-drive bonus* to each driver's share of the *parking-lot earnings*, if it happened that their share of the *parking-lot earnings* is less than their parking-lot charge. This means that the employee's *must-drive bonus* would be equal to their *parking-lot charge* minus their share of the *parking-lot earnings*.

If an employer decided to pay a *must-drive bonus* to its employees, it would be possible to allow employees to effectively "opt out" of the program so they would not need to be mailed the car-parking statements. The system would feel like "free parking" to them.

The "must drive" bonus would protect the economic interests of drivers, including low-income drivers, who find that they must continue to drive. It also can answer an employer's concern that the program would put them at a disadvantage, with respect to companies that continue to have "free" parking. (We would argue just the opposite: employees will appreciate the company being more environmentally aware and more economically just, making competitors that stick with the old system look unaware and part of the climate-crisis problem.) It is anticipated that funding the "Must-Drive Bonus" would be a responsibility of the employer, although it is possible that if there is a grant involved, the money could come from the grant.

**A Case for Suburban Implementations**

Implementing parking systems that unbundle the cost of parking need to start with a reduced set of features, compared to a full-featured system. It is unwise to suggest that good systems should not be implemented in the suburbs. If a factory in section of San Diego that had no transit at all were to unbundle the cost of its parking, there would be very little hardship on drivers, because most of the workers would continue driving. For example, if there were 100 workers and the charge was \$5 per day and only 2 employees biked to work and everyone else drove alone, the money to be divided among the 100 employees would be \$490 dollars per day. Each worker (this simplified example assumes everyone works the same number of hours per day) would earn \$4.90 per day. The two bicycle riders would net a plus \$4.90 per day. The drivers would net a loss of ten cents per day. Note that if the two unused parking



AG-26

AG-27

**Response to Comment AG-27**

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter AG

spaces could be rented out to the general public, for \$5 per day, the drivers could break even. The authors of the Draft CAP perhaps do not want to take the time to consider this proposal because they think that unbundling in the suburbs would not work. This is false, as the simple example shows. Since the employees will feel like the bike riders are getting paid to not drive, they will all consider joining them. Therefore, it would not be surprising if the number of bike commuters were to increase to three or more.

AG-27

**Data Showing that the Driving-Reduction Mitigation Could Be Significant**

Table 5 is taken from Reference 9.

**Table 5 Eleven Cases of Pricing Impact on Parking Demand**

Location	Number of Workers @ Number of Firms	1995 \$'s	Parking Use Decrease
<b>Group A: Areas with poor public transportation</b>			
West Los Angeles	3500 @ 100+	\$81	15%
Cornell University, Ithaca, NY	9000 Faculty & Staff	\$34	26%
San Fernando Valley, LA	850 @ 1	\$37	30%
Costa Mesa, CA	Not Shown	\$37	22%
Average for Group		\$47	23%
<b>Group B: Areas with fair public transportation</b>			
Los Angeles Civic Center	10,000+ @ "Several"	\$125	36%
Mid-Wilshire Blvd, Los Angeles	1 "Mid-Size" Firm	\$89	38%
Washington DC Suburbs	5,500 @ 3	\$68	26%
Downtown Los Angeles	5,000 @ 118	\$126	25%
Average for Group		\$102	31%
<b>Group C: Areas with good public transportation</b>			
U. of Washington, Seattle, WA	50,000 employees, students	\$18	24%
Downtown Ottawa, Canada	3,500 government staff	\$72	18%
Bellevue, WA	430 @ 1	\$54	39%*
Average for Group, except Bellevue, WA Case*		\$45	21%
Overall Average, Excluding Bellevue, WA Case*			25%

AG-28

Bellevue, WA case was not used in the averages because its walk/bike facilities also improved and those improvements could have caused part of the decrease in driving.

The top row of this letter's Table 3 indicates that if this result were to be applied to all of the workers in the TPAs, the overall average reduction to driving of 25% (just over twice the 12% shown in the top row of Table 3) would result in over 220,000 MT of CO2e per year. Clearly this strategy is worth implementation, especially since it is both technologically feasible and cost effective. Since parking is expensive to provide and unused parking could be converted to better uses, this strategy will be cheaper than free, after the initial designs are implemented.

**Response to Comment AG-28**

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter AG

Besides this, our climate crisis requires that we develop strategies that could be "dialed up" as needed. This is such a policy because the price could be adjusted upward, if needed. This will not be judged as "draconian" because the earnings are returned to the employees. (Allowing climate destabilization would be "draconian".)

AG-28

**Specific Policy Suggestion**

**Action 3-7:**

Develop a Parking Reform Implementation Plan by 2016, to include methods to unbundle the cost of parking, first at schools and places of employment, but to extend into all parking, in both suburban and urban areas, by 2025. The first reduced-feature, demonstration projects, which would include automated, monthly, pricing-and-payout statements, with net earnings or charge for each employee, should be implemented no later than 2017. By 2020, these reduced-feature systems should cover no less than 40% of all work-place parking that was previously bundled-cost parking. The system should eventually include instantaneous pricing to ensure availability; fully shared, anybody-can-park-anywhere parking availability with no or very-infrequent time limits; GPS-system directions to the best parking at the desired price; accurate price estimations; mailed statement features that will protect privacy; and the capability to reduce price as needed to protect low-income drivers and handicapped drivers. By 2025, 80% of all parking that would have been unbundled-cost parking in 2012, would be covered by these systems. Parking on the property of single-family homes, apartments up to 6 units, and all individually-owned parking behind garage doors are exempt. All on-street parking is covered by this system. More detail can be seen for one such system at <http://www.sandiego.gov/environmental-services/pdf/sustainable/parkingcosts.pdf>.

AG-29

**FAILURE TO INCLUDE AN EDUCATION PROGRAM AND INFRASTRUCTURE ACCESS PROJECTS TO INCREASE THE USE OF BICYCLE TRANSPORTATION, TO REDUCE DRIVING**

The criterion for spending money for bicycle transportation should be to maximize the resulting estimated reductions in driving. This criterion is not being used at SANDAG and it may not be getting used at San Diego. There were no statements in the subject documents on using any particular criterion for the ranking of bicycle projects. The subject documentation should be amended to require that the City adopt this criterion and that the City representatives to SANDAG urge SANDAG to adopt this criterion, for its bicycle expenditures.

**Projects**

Each TPA, each of SANDAG's well-documented Smart-Growth Concept Map Smart-Growth areas, and each high-trip-generation locations (such as the airport) should be checked to see if bicycle access could be substantially improved with either a traffic-calming project, a "complete streets" project, more shoulder width, or a project to overcome some natural or made-made obstacle. These projects should be prioritized using a cost/benefit ratio metric. These projects should be allowed to compete with the current bicycle projects planned.

AG-30

Then, projects should be selected for implementation, from the top of the list (lowest cost-to-benefit ratio) down, until the money is used up.

Building recreational bike paths may also be a cost-effective expenditure. However they do send a message that bikes do not belong on the road. Only data can resolve this debate.

**Response to Comment AG-29**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment AG-30**

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter AG

**Education**

Also competing for the money should be the "project" of bicycle education, using the League of American Bicyclist's "Traffic Skills 101" class, taught by League (this stands for the League of American Bicyclists) Certified Instructors ("LCI" Classes). To scale this program up to meaningful levels, subsidy of both the instructors and student should be considered.

1.) Teach students about bicycle accident statistics (most serious injuries occur to cyclists in accidents not involving a motor vehicle), car-bike accident statistics (most are caused by wrong-way riding and errors in intersections), and how to ride in all conditions, to minimize problems.

2.) Teach students riding-in-traffic skills and how to ride in other challenging conditions, by having the class members and instructor go out and ride in real conditions, until proficiency is achieved and demonstrated.

Students that pass a rigorous written test and demonstrate proficiency in traffic and other challenging conditions are paid for their time and effort, to ensure that the number of students can be large enough to make a significant difference. Methods to recruit low-income adults and students should be employed but all applicants, from all ages and all walks of life, should be accepted.

To be clear, these classes should be based on the curriculum developed by the League of American Bicyclists and taught by instructors certified by the League.

Here is an example of how to scale up the size of the program and reach into communities that might not be able to rationalize the time and expense of taking a class. Assuming a class size of 4 riders per instructor and that each rider passes both tests and earns \$100 and that the instructor, with overhead, costs \$400 dollars, for a total of \$800 for each 4 students, means that \$10M could educate  $\$10M/\$800 = 12,500$  classes of 4 students, for a total of 50,000 students, out to year 2050. For \$20M, 100,000 students could graduate. Data should be collected to verify that this is a cost effective method of reducing VMT.

**FAILURE TO HELP THE READER UNDERSTAND WHAT IT WILL TAKE TO GET CALIFORNIA CAR AND LIGHT-DUTY TRUCKS (LDVS) TO SUPPORT CLIMATE STABILIZATION**

Reference 12 is an example of a document that develops a set of requirements to ensure that California cars and light-duty trucks (the LDV sector) will support climate stabilization. It makes use of a key, unambiguous statement in Reference 13. It has been peer reviewed by the Air and Waste Management Association (AWMA).

**FAILURE OF THE SCREENING CRITERIA TO RECOGNIZE THAT WE HAVE A CLIMATE CRISIS AND THAT KEEPING EMISSIONS BELOW THE STATE'S CURRENT CLIMATE MANDATES IS NO ASSURANCE OF SUPPORTING CLIMATE STABILITY, IN THE CUMULATIVE SENSE, AND CERTAINLY NO ASSURANCE THAT A PROJECT WILL NOT BE SIGNIFICANT, IN TERMS OF GHG EMISSIONS**

Section 1 says that if a project meets AB 32, it is not significant. The facts are that if a project fails to support AB 32, it is known to be contributing to destabilization, which equates to a devastating collapse of the human population, as shown in this letter. If a project is not doing this, then it does not follow that it is therefore insignificant. AB 32 is in fact a threshold of catastrophe, not a threshold of significance. Given the severity of our climate crisis, any

AG-31

AG-32

AG-33

**Response to Comment AG-31**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment AG-32**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment AG-33**

Please see Responses to Comments N-3 and AG-8.

Comment Letter AG

project should be reviewed and all feasible mitigations that are cost effective should be applied.

↑ AG-33

Section 2.1 misleads the reader into thinking that if atmospheric CO<sub>2</sub>e does not exceed 450 parts per million, we know that the temperature change will stay below 2 degree Celsius. See the section of this letter titled *The Definition of Climate Destabilization, the Omission of This Definition in the Subject Documents, and Why this Omission Violates CEQA Law* to see that this is not true at all. Section 2.1 is an unacceptably poor "Climate Science Overview". It should be replaced with the contents of this letter's *The Definition of Climate Destabilization, the Omission of This Definition in the Subject Documents, and Why this Omission Violates CEQA*.

AG-34

Section 3.1 contains many misleading and unacceptable statements. The updated scoping plan, Reference 1 of this document, is a state plan and it certainly extends past the year 2020. For this reason, it is not reasonable to not consider the 2030 target of B-30-15.

AG-35

Section 3.2 admits that substantial evidence is needed. There is no credible, substantial evidence that justifies ignoring emissions after 2020.

AG-36

The very sad fact that other municipalities have skirted the law and only looked to 2020 is no justification for doing that here. In Section 3.2, all discussion should end with this statement (emphasis added):

The overall framework of GHG significance determination is based on the following questions in the checklist contained in Appendix G of the CEQA Guidelines:

AG-37

A project would have a significant effect on GHG emissions if it would:

- Generate greenhouse gas emissions, either directly or indirectly, that ***may have*** a significant impact on the environment

Section 3.2 then twists this in a way which violates the "may have" criteria. Given the precarious nature of our climate crisis as shown by the information on climate stabilization presented in this letter from Reference 1, an official document of California, it well may be too late to prevent human extinction. This is shown to be true by the following facts, from Reference 1:

- It was thought that capping the atmospheric level of CO<sub>2</sub>e at 450 PPM by 2050 would ensure a temperature rise of less than 2 degrees Celsius and that staying below 2 degrees would achieve stability
- Capping the atmospheric level of CO<sub>2</sub>e at 450 PPM by 2050 may not happen
- We may actually need to cap at 400 PPM to ensure a temperature rise of 2 degrees Celsius, which is impossible because the value is already above 400 ppm
- We may be aiming for a temperature change (2 Degrees Celcius) that would not stabilize the climate at a livable level after all and in any case
- We should have been aiming at 1.5 degree Celsius

AG-38

These facts invalidate most of the Screening Criteria assertions and all of its significant conclusions.

The "too small to matter" approaches, taken, for example, at the start of section 3.3, where the text calls out a limit of 1,350 MT per year, are faulty because what matters is that the

AG-39

**Response to Comment AG-34**

Please see Responses to Comments N-3 and AG-8.

**Response to Comment AG-35**

Please see Responses to Comments N-3 and AG-8.

**Response to Comment AG-36**

Please see Responses to Comments N-3.

**Response to Comment AG-37**

Please see Responses to Comments N-3.

**Response to Comment AG-38**

Please see Responses to Comments N-3 and AG-8.

**Response to Comment AG-39**

Please see Responses to Comments N-3 and AG-8.

## Comment Letter AG

product of the per-capita emissions, multiplied by the population; because that product gives net emission and net emission is what drives climate change. A small project may not emit much GHG but if it also serves a small population, the fact that it's emission total is small does not matter. The whole "too small to matter" criterion fails because of this.

**FINAL COMMENTS**

Other mitigations, which are described in References 14 should also be considered for implementation. This letter has shown many reasons why the subject documents need to be revised.

Respectfully submitted,



Mike Bullock mike\_bullock@earthlink.net  
Chair, Transportation Subcommittee  
Sierra Club San Diego



Debbie Hecht  
Chair, Steering Committee  
Sierra Club San Diego

AG-40

AG-41

**References**

Note: References 7, 8, 10, 11, 12, and 14 were attached in the email sent to the City that contained this letter. Many of the other references can be viewed at the links shown.

- 1.) *First Update to the Climate Change Scoping Plan*, pursuant to AB 32; [http://www.arb.ca.gov/cc/scopingplan/2013\\_update/first\\_update\\_climate\\_change\\_scoping\\_plan.pdf](http://www.arb.ca.gov/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf)
- 2.) Tarback, E.; Lutgens, F.; *Earth Science*; Tenth Edition, published by Prentice Hall, 2003, page 539
- 3.) Vespa, M.; *Comments on Survey of CEQA Documents on Greenhouse Gas Emissions Draft Work Plan and Development of GHG Threshold of Significance for Residential and Commercial Projects*, Letter from Center for Biological Diversity to Elaine Chang, Deputy Executive Officer of Planning, Rule Development, and Area Sources of the South Coast Air Quality Management District; dated April 15, 2009. [http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-10/ghg-meeting-10-cbd-comment-letter.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/year-2008-2009/ghg-meeting-10/ghg-meeting-10-cbd-comment-letter.pdf?sfvrsn=2)
- 4.) Hertsgaard, M; *Latino Climate Solution, the Nation*, Dec. 24/31, 2012
- 5.) Whitney E.; *How to Meet the Climate Crisis*, *UU World*, Volume XXVI No. 4, Winter 2012
- 6.) *Quantifying Greenhouse Gas Mitigation Measures. A Resource for Local Government to Assess Emission Reductions from Greenhouse Gas Mitigation Measures*; August, 2010; California Air Pollution Control Officers Association

**Response to Comment AG-40**

Please see Response to Comment AG-39.

**Response to Comment AG-41**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Comment Letter AG**

- 7.) Letter from San Diego Sierra Club Transportation Chair to Linda Giannelli Pratt and Anna McPherson, regarding San Diego's C-MAP and Negative Declaration document for the C-Map, September 28, 2012
- 8.) Letter from San Diego Sierra Club Transportation Chair to Brian Schoenfisch, Senior Planner of the Planning, Neighborhoods & Economic Development Department, City of San Diego, regarding San Diego's Draft Climate Action, December 13, 2013
- 9.) M. Bullock & J. Stewart, *A Plan to Efficiently and Conveniently Unbundle Car Parking Costs*; Paper 2010-A-554-AWMA, from the Air and Waste Management Association's 103<sup>rd</sup> Annual Conference and Exhibition; Calgary, Canada, June 21-24, 2010; <http://www.sandiego.gov/environmental-services/pdf/sustainable/parkingcosts.pdf>
- 10.) Bullock, Mike; *Equitable and Environmentally-Sound Car Parking Policy at a Work Site*; Aug. 30, 2015; unpublished report; attached with submission of comment letter and available on request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net)
- 11.) Bullock, Mike; *Equitable and Environmentally-Sound Car Parking Policy at Schools*; July 20, 2011; unpublished report; attached with submission of comment letter and available on request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net)
- 12.) Bullock, Mike R; *The Development of California Light-Duty Vehicle (LDV) Requirements to Support Climate Stabilization: Fleet-Emission Rates & Per-Capita Driving*, Paper 30973-AWMA, from the Air and Waste Management Association's 107<sup>th</sup> Annual Conference and Exhibition; Long Beach, CA, June 24-27, 2014; Attached with submission of comment letter and available on request from [mike\\_bullock@earthlink.net](mailto:mike_bullock@earthlink.net)
- 13.) Hansen, James, *Brief of Amicus Curiae, Exhibit A*; United States District Court for the Northern District of California San Francisco Division, Case 4:11-cv-02203-EMC Document 108 Filed 11/14/11 <http://ourchildrenstrust.org/sites/default/files/Hansen%20Amicus%20.pdf>
- 14.) *Ideas and Proposals for San Diego CAP Improvements*, December 12, 2013, based on a boiler-plate document, written by a group of San Diego Sierra Club activists who were working on multiple climate action plans. (Attached in the email containing this letter)

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The San Diego Chapter of the Sierra Club is San Diego's oldest and largest grassroots environmental organization, founded in 1948. Encompassing San Diego and Imperial Counties, the San Diego Chapter seeks to preserve the special nature of the San Diego and Imperial Valley area through education, activism, and advocacy. The Chapter has over 11,000 members. The National Sierra Club has over 700,000 members in 65 Chapters in all 50 states, and Puerto Rico.



Comment Letter AH

**COMMUNITY FOREST ADVISORY BOARD  
CITY OF SAN DIEGO**



September 29, 2015

Ms. Rebecca Malone, Associate Planner  
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[DSDEAS@saniego.gov](mailto:DSDEAS@saniego.gov)

Re: Comments on Draft Program Environmental Impact Report (PEIR) for San Diego Climate Action Plan (CAP)

Dear Ms. Malone:

Thank you for the opportunity to comment on the PEIR for the City's Climate Action Plan (CAP). These comments follow from the Community Forest Advisory Board's (Board) responsibilities to provide recommendations on urban forestry-related policies and programs; reviewing the implementation and compliance with urban forestry policies and programs; and advocating for funding for the establishment and maintenance of an urban forestry program.<sup>1</sup> The Board passed a resolution on September 9, 2015 for the submission of this letter as official comment on the PEIR.

The City's draft CAP includes Strategy 5 (Climate Resiliency), with targets for an Urban Tree Planting Program to achieve 15% urban tree cover by 2020 and 25% by 2035. This letter outlines considerations for the Environmental Setting, Project Description, and Impacts for these targets.

AH-1

**PEIR Chapter 2. Project Description**

**F. Greenhouse Gas Strategies and Reductions**

**Strategy I: Water and Energy Efficient Buildings**

This strategy identifies improving water rate structures by such strategies as installing landscaping that uses less water. It also notes that, "an Outdoor Landscaping Ordinance would result in more efficient landscape irrigation systems and could encourage the installation of landscaping that uses less water."

The dominance of water use reduction through vegetation removal and very reduced irrigation schedules is slowly resulting in greater (although unmonitored) tree mortality in the City. This CAP strategy needs to recognize the benefits of trees and explicitly state that tree irrigation is a legitimate component of climate mitigation and adaptation.

AH-2

**Response to Comment AH-1**

Comment noted.

**Response to Comment AH-2**

Comment noted. The CAP also includes CAP Action 5.1, Urban Tree Planting Program. For additional information related to GHG reductions from Action 5.1, please see CAP Appendix page A-43. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting.

**Comment Letter AH**

Letter from CFAB about PEIR for Climate Action Plan (CAP), September 29, 2015, page 2

While it is imperative that the City reduce and then provide for future water needs, the trees are actually part of the “built environment” that accompanies residential, commercial, and industrial land use. No one expects to live in houses without appliances or neighborhoods without schools, yet it is inconceivable to live on a street without trees and shade—and there are actually many in the City.

The PEIR needs to incorporate trees to increase energy efficiency of buildings. Trees can be planted to reduce building energy use, as they shade buildings and lower the temperature of the ambient air around buildings.

**Strategy 3: Bicycling, Walking, Transit, and Land Use**

The high goals for active transportation are some of the most critical goals in the Climate Action Plan. As walking increases as a way to get to work, shopping and leisure activities, the “walkability” of streets will be increasingly important. Trees are important components in the “livability” of creating conditions to attract residents to the City of Villages.

**Strategy 5: Climate Resiliency**

CFAB has advocated for and supports a city-wide urban tree planting program. The trees along streets, in parks and open space areas, and on residential and commercial properties provide many benefits to the City, its residents and visitors. The additional trees will provide shade, save energy, improve air quality and public health, sequester carbon, reduce stormwater runoff, increase property values, create wildlife habitat, and enhance quality of life.<sup>ii</sup>

In Table 2-3, the percent contribution of urban tree cover (tree planting) is 2 to 4% of the total projected GHG reduction. Such a low percent is a reminder that the quantities of GHG produced by buildings, transportation, and landfill waste are very large. The primary benefit of urban tree canopy will be the “liveability” for the City’s residents as the average temperature rises.

The “urban heat island reduction” effect is only mentioned on page 3.A-21 as policy CE-A.2 of the General Plan. Yet it is the predominant benefit of trees and should be further developed for this strategy. Broad canopy trees lower temperatures by shading buildings, asphalt, and concrete. They deflect radiation from the sun and release moisture into the air. The “urban heat island effect” is the resulting higher temperature of areas dominated by buildings, roads, and sidewalks.

Cities are often 5 to 10°F hotter than undeveloped areas, because hot pavement and buildings have replaced cool vegetated land. In addition, high temperatures increase the volatility of automobile oil and oil within the asphalt itself, releasing the fumes into the atmosphere. Shade trees can reduce asphalt temperatures by as much as 36°F, which diminishes the fumes and improves air quality.<sup>iii</sup>

Tree planting will require funding, education, incentives, compliance with regulations and permits, and other approaches, few of which are outlined in the CAP. As the City has been planting only a few hundred trees annually in the past decade, the tree planting and care program needs to be greatly accelerated. A Chinese proverb says, “The best time to plant a tree is 20 years ago. The next best time is now.”



AH-2

**Comment Letter AH**

Letter from CFAB about PEIR for Climate Action Plan (CAP), September 29, 2015, page 3

Larger trees need to be favored, as they provide larger canopies and sequester more carbon. Trees need to be watered, pruned, and protected in order to maximize their health and life span. They are one of the few municipal assets that appreciate with age.

Trees need to be planted in all neighborhoods to achieve the increased tree canopy, but priority needs to be given to areas that have few parks and street trees. The CAP should clearly identify urban tree canopy priorities for tree-deficient communities, underserved communities, and potential connectivity to open space and natural areas.

One proposed action, to implement Strategy 5 for increasing the urban tree canopy coverage, has been completed:

Mr. Jeremy Barrick began working as the City’s Urban Forestry Program Manager on August 17.

Two of the proposed actions are underway:

The Urban Tree Canopy Assessment (UTCA) will be undertaken in early 2016 with funds from the California Department of Forestry and Fire Protection (CalFire). This will accurately describe both the Environmental Setting and identify the areas that trees can be planted and managed. The UTCA will use high-resolution remotely-sensed Light Detection and Ranging (LiDAR) data recently obtained by the City (to a 4-inch resolution). The methods for converting the billions of LiDAR data bits into geospatial data were established with a team led by the USDA FS and have been applied to more than 70 communities to confirm current urban forestry assets and identifying places where additional investments can be made. Urban parcels are ranked on their suitability for increased tree canopy, water quality improvement and watershed management, habitat conservation, and community livability (noise and pollution reduction, urban cooling).

The Urban Forest Management Plan is undergoing environmental review and is expected to be presented to City Council in late 2015 for adoption.

**PEIR Chapter 3. Environmental Impacts and Mitigation Measures.**

**A. Land Use, page 3.A-21**

The actions proposed in the current CAP do not calculate the resources to double tree cover (from current estimate of 4 to 7 percent, to target of 15 percent). Therefore the PEIR may incompletely describe the environmental impacts.

The most recent tree inventory (2002) shows that there are about 200,000 street trees in San Diego.<sup>iv</sup> As there is no recent inventory of trees on private land, the assumption (for this letter) is that street trees are 20% of the total trees, and therefore the rough estimate is that there are 1,000,000 trees in the City. To double the tree canopy, land use changes need to provide for 1,000,000 more trees to be planted on public and private land.

These changes in land use, and their resulting environmental impacts (positive and negative) result from tree planting opportunities on several categories of public and private property in the City:

- Streets and parkways, with City funding
- Parks, community centers, with City funding



AH-2

AH-3

**Response to Comment AH-3**

**A – Land Use.**

Draft EIR Chapter 3.A, Land Use, evaluates the consistency of the CAP with existing land uses and related planning documents, such as the City of San Diego General Plan. Page 3.A-14 lists the Significance Criteria and Significance Determination Thresholds used to determine whether the CAP would potentially cause a significant impact with respect to Land Use. Because the CAP has been prepared to be consistent with the City’s General Plan, and to further implement General Plan Policy CE-A.2, which calls for a reduction in the City’s carbon footprint, the CAP is found to be consistent with General Plan policies, and not to cause a significant impact with respect to Land Use. In addition, General Plan Policy CE-A.2 specifically calls for the adoption of new or amended regulations that would “reduce the urban heat island effect through sustainable design and building practices, as well as planting trees (consistent with habitat and water conservation policies) for their many environmental benefits, including natural carbon sequestration.” The Urban Tree Planting Program targets included in Strategy 5 of the CAP, would contribute to this effort, and therefore, would be consistent with the City’s General Plan.

**B – Visual Effects and Neighborhood Character.**

Draft EIR Section 3.B, Visual Effects and Neighborhood Character, evaluates the potential effects of the CAP on visual resources and neighborhood character. The impact analysis in this section discusses implementation of CAP Action 5.1, Urban Tree Planting Program, such that the planting of new trees would adhere to policies contained in the General Plan, community plans, and the Urban Forest Management Plan. Conforming to existing policies and plans will allow implementation of the Urban Tree Planting Program without causing an adverse impact on scenic views. This Section of the Draft EIR also acknowledges that “...trees themselves add aesthetic value...” thereby stating a potential benefit of the Urban Forest Management Plan for visual resources and neighborhood character.

**Comment Letter AH**

Letter from CFAB about PEIR for Climate Action Plan (CAP), September 29, 2015, page 4

- Open space (this is limited as much of the acreage is committed to Multiple Species Habitat Areas for native vegetation)
- Schools, colleges, and other public properties
- Residential properties (front and back yards)
- Replacement of trees required in development permits (trees in parking lots, commercial properties, common areas in developments)
- Fruit trees, in community gardens, residential and commercial properties

**B. Visual Effects and Neighborhood Character**

Trees make an important contribution to human experiences in the city, as identified in the Urban Design (UD) section of the 2008 General Plan, which provides for the following:

- UD-A.12. g. Retrofit existing expansive parking lots with street trees....
- UD-A.12. i. Use trees and other landscape to provide shade, screening, and filtering of storm water runoff in parking lots.
- UD-C.7. d. Implement pedestrian facilities and amenities in the public right-of-way including wider sidewalks, street trees.....

The PEIR needs to address the compliance inspections and enforcement for trees in development permits, and require the replacement of missing trees around buildings and in parking lots.

In B.4 Impacts and Mitigation Measures, the list of significant impacts includes, “The loss of any distinctive or landmark tree(s) or stand of mature trees as identified in the community plan. Yet most community plans do not identify these.

Impact Analysis (page 3.B.21) included the claim, “Street and landscaping trees have the potential to alter or block scenic views and vistas, and to alter neighborhood character.” Further description of the Urban Tree Planting Program (page 3.B-23) identifies the potential of trees to block or alter scenic views, but the creation of more positive scenic views with trees is not mentioned. Many community plans identify scenic corridors.

The following is identified as an impact (page 3.B-23), yet should not be allowed by the City: “Trees that grow to the point that they do obstruct scenic views can be pruned, topped, or removed, which would mitigate the impact.” Topping trees is a prohibited xxx<sup>v</sup> not a professional tree care practice, and this should be removed from the report. The unprofessional topping of trees added as an impact in another section.

The aesthetic value of trees to urban landscapes is acknowledged at the bottom of page 3.B-25. Further description of tree benefits should be added to this section.

**C. Air Quality**

The PEIR acknowledges that the City’s General Plan has a strong policy advocating the preservation and planting of trees (CE-F.4, listed on page 3.C-17).

The benefits of Strategy 5 (urban tree canopy increase) need to be clearly articulated in the Impact Analysis (page 3C-18).

**F. Transportation and Circulation**

AH-3

**C – Air Quality.**

Comment noted. Action 5.1: Present to City Council for consideration a city-wide Urban Tree Planting Program has been added to the analysis in Chapter 3C, Air Quality.

**F – Transportation and Circulation.**

Draft EIR Chapter 3.F, Transportation and Circulation, evaluates the potential transportation impacts that could result from implementation of the CAP. In the Regulatory Setting section, the Draft EIR lists policies included in the General Plan that pertain to transportation and circulation, including ME-A.7, which is related to improving walkability through pedestrian-oriented design of projects. This includes enhancing streets and other public rights-of-way with amenities such as street trees, and using trees as part of non-contiguous sidewalk design. On page 3.F-18, in the discussion of Issue 3, the Draft EIR states that the CAP would implement the City of San Diego’s Pedestrian Master Plan, which would enhance pedestrian facilities and connectivity. This plan includes a discussion of how trees promote walkability, and includes goals for creating pedestrian facilities that offer amenities such as street trees. Since the CAP would implement the Pedestrian Master Plan, these amenities are recognized as benefits related to pedestrian facilities.

**G – Utilities.**

Comment noted.

**H – Water Supply.**

Draft EIR Chapter 3.H, Water Supply, evaluates the potential impacts on water supply that could result from implementation of the CAP. In the Regulatory Setting section, the Draft EIR lists regulations pertaining to water supply, including the City’s Urban Water Management Plan which includes provisions for watering trees during drought conditions, as well as policies included in the General Plan that support urban forestry, such as CE- D.1.e. Conformance to these existing plans and policies will allow for adequate watering of trees planted as part of the CAP Urban Forest Management Plan.

**Comment Letter AH**

Letter from CFAB about PEIR for Climate Action Plan (CAP), September 29, 2015, page 5

The PEIR acknowledges that the City's General Plan has a policy that addresses the value of non-contiguous sidewalk design, and the allowance of contiguous sidewalks with trees planted in grates adjacent to the street (ME-A.7. c, listed on page 3.F-8). Further benefits need to be identified for streets as they enhance the "walkability" and thus encourage active transportation for work, shopping and leisure activities.

**G. Utilities**

The PEIR acknowledges that the City's General Plan has a policy for reducing the amount of impervious surfaces through selection of materials, site planning, and street design where possible (CE-E.2c and CE-E.2d, listed on page 3.G-15). This can increase tree cover, and will reduce the heat absorption by streets and buildings that contribute to the "urban heat island" effect.

**H. Water Supply**

The PEIR acknowledges the application of water conservation measures to minimize water use for tree plantings, use of drought-tolerant plants, and prioritizing planning in areas with recycled water and grey water infrastructure (page 3.H-12). In the Impacts Analysis (page 3.H-14), the water conservation measures are listed, but the losses relating to insufficient tree watering are not outlined.

Water availability, cost, and the current drought have raised concerns about planting and watering trees. Yet trees provide important benefits and will shade and cool for the climate warming that is predicted. Small, low water trees need only about 15-20 gallons a month (about one shower) and large and mature, low water trees need about 30-40 gallons a month (one load of laundry), all with deep, infrequent watering. Additionally, trees shade other landscaping, reducing its water needs.

The City's Urban Water Management Plan <http://www.sandiego.gov/water/pdf/uwmp2010.pdf> provides for trees and shrubs to be watered under all drought restriction level (including level 4), and the PEIR should confirm the importance of retaining those policies. In many locations, the City needs to make investments in landscaping systems and zones that allow for trees to be provided deep soaking at infrequent (monthly) intervals.

**PEIR Chapter 8. Alternatives**

An "environmental justice" alternative is important to consider. There is substantial benefit to preferentially planting and caring for trees in communities that have few street trees, low park acreage, high health risks, and limited incomes. Analysis of the (outdated) 2003 tree inventory showed that trees per street mile is lowest in such neighborhoods as Barrio Logan, Midway, Linda Vista, City Heights and Southeast.<sup>vi</sup>

**Strategy 2 = Clean and Renewable Energy.**

There is no mention of the impacts of trees shading solar energy panels, or the impacts of solar energy panels on trees. The PEIR needs to address the tree losses, or lost opportunities for planting trees, when raised solar panel arrays are installed.

**Additional comments**

The positive environmental benefits of trees are well documented<sup>vi</sup> and include these most directly related to climate mitigation and adaptation. Trees are one of the few infrastructure investments that grow in value over time.



**Response to Comment AH-4**

Regarding the Environmental Justice Alternative, please see Response to Comment AD-4. Regarding CAP Strategy 2, a supporting measure for Action 2.1 provides for policies, programs, and ordinances that facilitate and promote siting of new onsite photovoltaic energy generation and energy storage systems. Regarding the potential for CAP Action 5.1 not be implementable due to the loss of land to solar arrays, please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment AH-5**

Please see Response to Comment AH-3.

## Comment Letter AH

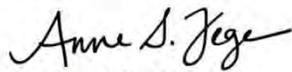
Letter from CFAB about PEIR for Climate Action Plan (CAP), September 29, 2015, page 6

- Trees absorb carbon dioxide and store carbon in wood (carbon sequestration).
- Trees insulate homes and businesses from extreme temperatures, keep properties cool, and reduce air conditioning utility bills.
- Trees reduce the “urban heat island effect.” They shade buildings, roads and sidewalks so they absorb less radiation during the day; absorb less radiation because of the color and material properties of leaves; and release moisture by evapotranspiration that cools the air.
- Shade trees return oxygen to the air and reduce air pollution by absorbing ozone, nitrogen dioxide, sulfur dioxide, and some particulate matter.
- Trees enhance stormwater, soil erosion control for more \_\_\_ storm events.
- Trees provide habitat for birds and other wildlife, and reduce noise for humans

AH-5

The Community Forestry Advisory Board and many local urban forestry professionals, landscape architects, and planners are committed to enhancing the urban tree canopy and its benefits, and can contribute information and strategies to the EIR. We recognize trees as valued City assets that provide many services to residents, businesses, and visitors, and that will contribute to climate change mitigation and adaptation.

Sincerely,



Anne Fege, Ph.D., M.B.A.  
Chair, Community Forest Advisory Board  
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cc:

CFAB Board

L.Henegar and M.Garcia-City Planning Staff

Community-based climate action groups

SD Regional Urban Forests Council, Environment-Design Council

## Footnotes:

<sup>1</sup> Community Forest Advisory Board, <http://www.sandiego.gov/economic-development/about/cfab.shtml>

<sup>2</sup> Benefits and economic values computed with iTree software from the USDA Forest Service, [www.itreetools.org](http://www.itreetools.org)

<sup>3</sup> Alliance for Community Trees, 2011. Alliance for Community Trees. 2011. Benefits of trees and urban forests: A research list. Unpublished white paper, 19 pp. (References 23 and 42) Available at [http://www.actrees.org/files/Research/benefits\\_of\\_trees.pdf](http://www.actrees.org/files/Research/benefits_of_trees.pdf).

<sup>4</sup> Streets Division completed this inventory in 2002, for trees in public rights-of-way but not in assessment districts. Data available as the “Trees SD” database at the San Diego Association of Governments. From Mike Klein, GIS Specialist, Planning Department, personal communication, October 8, 2014.

<sup>5</sup> California Government Code, 53067. Tree pruning, legislative declaration; specifications, <http://www.ufci.calpoly.edu/files/pubs/CGC53067-TreePruning.pdf>

<sup>6</sup> City of San Diego Community Forest Advisory Board, 2013. Urban Forest Management Plan: background and current conditions. Available at [http://sdapa.org/go/wp-content/uploads/2013/10/CitySD\\_UFMPlan\\_2013-02-12.pdf](http://sdapa.org/go/wp-content/uploads/2013/10/CitySD_UFMPlan_2013-02-12.pdf)

<sup>7</sup> Alliance for Community Trees. 2011. Benefits of trees and urban forests: A research list. Unpublished white paper with citations of source documents, 19 pp. Available at [http://www.actrees.org/files/Research/benefits\\_of\\_trees.pdf](http://www.actrees.org/files/Research/benefits_of_trees.pdf).



Comment Letter AI  
Circulate San Diego  
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San Diego, CA 92101  
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Fax: 619-531-9256  
www.circulatesd.org

September 29, 2015

Ms. Rebecca Malone  
City of San Diego Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

RE: San Diego Climate Action Plan Draft PEIR Comments

Dear Ms. Malone,

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, we are pleased to submit these comments on the City of San Diego's Climate Action Plan (CAP) Draft Programmatic Environmental Impact Report (PEIR). Circulate San Diego is a regional non-profit organization dedicated to creating great mobility choices, more walkable and bikeable neighborhoods, and land uses that promote sustainable growth.

We support the CAP's legally-binding greenhouse gas reduction targets. In committing to and meeting these targets, the City will be doing its part in helping the state meet its 2020, 2030, and 2050 targets and be a leading example of addressing climate change regionally, statewide, and nationally. Further, actions required to meet the targets build on a foundation of policies and programs already in place.

AI-1

Based on our review of the EIR document, we would like to offer the following recommendations.

- 1. *Develop a 1-Year Implementation Plan.* To ensure success of the Plan, implementation steps should be outlined. These steps can be outlined for the first year, specifically, to launch key strategies of the Plan and help budget necessary resources.

An example of budgeting needs includes, but is not limited to, infrastructure improvements needed to implement the Bicycle and Pedestrian Master Plans. Specifically, we recommend a share of transportation funds to match the CAP's proposed mode-share goals and the expenditure of these funds in areas where traffic collisions have been concentrated, namely disadvantaged neighborhoods, as outlined in the Vision Zero Resolution adopted by the Infrastructure Committee September 16, 2015.

AI-2

Other exemplary budgeting needs could include tree planting sufficient to implement the Urban Forest Management Plan and 2020 goals.

*Creating excellent mobility choices and vibrant, healthy communities.*

**Response to Comment AI-1**

This comment does not address the adequacy of the Draft EIR. Comment noted.

**Response to Comment AI-2**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Comment Letter AI**

2. *Coordinate Final Review of Pending Community Plan Updates with Final Review of Climate Action Plan.* Several community plan updates are currently underway or in the pipeline. These plans are key to implementing the Climate Action Plan. In addition to the CAP Consistency Checklist (Appendix A) developed for proposed development projects, the City should provide a CAP Consistency Checklist for Community Plan Updates to ensure these updates implement the CAP at the neighborhood scale, prior to Council adoption of the relevant community plan update. The City of San Diego should also publish or attach these checklists as backups to docket items on City Council agenda items. Success metrics should include reduction of Vehicle Miles Travelled (VMT) and improvement of air quality. *Regional Transportation Planning and Funding – Leverage City Position at SANDAG.* We support the mode-shift goals outlined in the CAP and believe these targets are achievable through appropriate expenditures, policies, programs and actions. As we have recently described in our report "[New Climate for Transportation](#),"<sup>1</sup> the City of San Diego should use its influence on the SANDAG Board to accelerate and increase transit, walking and bicycling infrastructure expenditures to benefit San Diego residents and help achieve GHG reduction goals. Specifically, SANDAG's Plan projects 15% of San Diegans would use alternate transportation by 2035 compared to the City's projection of 50%.

AI-3

3. *Regional Transportation Planning and Funding – Leverage City Position at SANDAG.* *Regional Transportation Planning and Funding – Leverage City Position at SANDAG.* We support the mode-shift goals outlined in the CAP and believe these targets are achievable through appropriate expenditures, policies, programs and actions. As we have recently described in our report "[New Climate for Transportation](#),"<sup>2</sup> the City of San Diego should use its influence on the SANDAG Board to accelerate and increase transit, walking and bicycling infrastructure expenditures to benefit San Diego residents and help achieve GHG reduction goals. Specifically, SANDAG's Plan projects 15% of San Diegans would use alternate transportation by 2035 compared to the City's projection of 50%.

AI-4

4. *Integrate Language on Social Equity into Goals, Targets and Actions in Chapter 3.* The Bicycling, Walking, Transit and Land Use strategy has many opportunities to focus resources where they are needed most to not only achieve GHG reductions but also community health and safety. As commented in the CAP Scoping Plan, we support the prioritization of related actions in disadvantaged neighborhoods ranked in the top 25 percent of CalEnviroScreen's ranking for the San Diego region. Some examples include:

AI-5

- Facilitate and support Transit Oriented Development throughout the City, starting in neighborhoods that are most impacted by climate change, as identified in the CalEnviroScreen.
- Improve bicycling and pedestrian infrastructure throughout the City and increase access to transit, starting in neighborhoods that are most impacted by climate change, as identified in the CalEnviroScreen.

<sup>1</sup> Circulate San Diego and Climate Action Plan, *New Climate for Transportation (2015)*.  
<http://circulatesd.nationbuilder.com/new-climate-for-transportation>, 2015.

*Creating excellent mobility choices and vibrant, healthy communities.*

**Response to Comment AI-3**

Please see Response to Comment N-3.

**Response to Comment AI-4**

Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting.

**Response to Comment AI-5**

This comment does not address the adequacy of the Draft EIR. Comment noted.

Comment Letter AI

- Improve bicycle and pedestrian infrastructure around the City's most dangerous corridors. The neighborhoods most affected by climate change broadly overlap the neighborhoods where a substantial portion of traffic injuries and death occur.

AI-5

5. *Include SB743 in Section F – Transportation and Circulation, Regulatory Setting, State.* SB743 is relevant to the CAP as it creates a process to change the way transportation impacts are analyzed under CEQA. The Governor's Office of Planning and Research has issued its draft set of guidelines to establish VMT reduction as an alternate way to measure transportation impacts. The draft guidelines criticize the use of vehicular Level of Service as forcing more road construction, minimizing transit use, and endangering bicyclists and

AI-6

*Include VMT Reduction in Section F.4 – Impacts for Mitigation Measures, Significance Criteria (P.3.F-12).* Following the suggestion above, please include the reduction of VMT as part of these criteria, specifically, 'Result in a reduction of VMT'.

Thank you for the opportunity to comment on this important plan. We look forward to working with the City to implement the Climate Action Plan strategies.

Sincerely,

Kathleen Ferrier, AICP  
Director of Advocacy

Response to Comment AI-6

The California Governor's Office of Planning and Research issued a draft set of guidelines on August 6, 2014, and are in the process of developing a revised draft which will be released for additional public review for the implementation of SB 743. Future projects would be analyzed in accordance with those guidelines once they have been finalized.

Comment Letter AJ

**Rancho Bernardo Community Planning Board**

P.O. Box 270831, San Diego, CA 92198  
[www.rbplanningboard.com](http://www.rbplanningboard.com)

September 17, 2015

Ms. Rebecca Malone  
City of San Diego, Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

RE: Comments on Draft City of San Diego Climate Action Plan and Draft Program Environmental Impact Report for the Draft Climate Action Plan

Dear Ms. Malone:

The Rancho Bernardo Community Planning Board appreciates the opportunity to provide comments on the City's draft Climate Action Plan and draft Program Environmental Impact Report (PEIR) for the draft Climate Action Plan (CAP). Presented below are the comments approved (by a vote of 8-0-0) for submittal to the Planning Department at the Planning Board's meeting of September 17, 2015.

Draft Climate Action Plan

The Rancho Bernardo Community Planning Board supports the City's proposal, as described in the draft Climate Action Plan (CAP), to pursue the local generation of clean energy as that is clearly an effective way to reduce greenhouse gas (GHG) emissions. That being said, the Planning Board has concerns regarding the effectiveness of other aspects of the draft CAP plan, as described below.

- According to the draft CAP, approximately 54 percent of community wide emissions are attributed to transportation, yet proposals to reduce these emissions do not appear to meet the challenge of substantially reducing vehicle trips. Coordination with other agencies, particularly MTS, is necessary in order to effectively reduce total GHG emissions in the City. Although great ideas for local travel, bicycle paths and pedestrian walkways will have little effect on commuters who live outside the higher density areas of the City, particularly those commuters traveling significant distances from home to job and back. Proposals should include local transit options that provide access from rapid bus lines and trolley stops to surrounding employment centers such as the Rancho Bernardo Industrial Park. These local transit options would also provide opportunities to reduce local community trips to medical facilities, school, and commercial developments in a community.
- Under Strategy 3 – Bicycling, Walking, Transit, and Land Use, Action 3.6 promotes the implementation of transit oriented development within Transit Priority Areas. The Transit Priority Areas proposed in the SANDAG 2050 RTP clearly have not taken into consideration topography, availability of local transit to connect with regional transit facilities, or distance from major transit areas. This is true in Rancho Bernardo, Otay Nestor, Ocean Beach, and the Sports Arena area. Changing land uses to increase density in the vicinity of, but not easily accessible to transit, only

AJ-1

**Response to Comment AJ-1**

This comment does not address the adequacy of the Draft EIR. Comment noted. Please see CAP Chapter 3 regarding CAP implementation monitoring and reporting, including annual reporting. The Transit Priority Areas map is based on the adopted SANDAG 2050 Regional Transportation Plan (RTP).

Comment Letter AJ

exacerbates current congestion problems on local streets and surrounding freeways. Transit-oriented development must be truly transit-oriented with easily accessible transit within reasonable walking distance of a development or assurances that local transit will be available to make the connection from the development to the transit station as the time that the new units are occupied.

- With respect to Strategy 5 – Climate Resiliency, the Planning Board supports the goal is to increase tree canopy coverage in the City. We do not however understand why this is included as a Phase 2 action when the Urban Forest Management Plan has already undergone public review and should be ready for approval. Increasing the tree canopy in the City should be one of the easier actions to implement and should begin now.
- It is unclear how the Pure Water Program described in the Adaptation chapter of the draft CAP represents efficient use of energy when a portion of the water to be used for irrigation would undergo advanced water purification, which undoubtedly requires more energy to produce than does water that comes directly from the North City Water Reclamation Plant (NCWRP). To save energy and money, the Rancho Bernardo Community Planning Board continues to support the extension of recycled water from NCWRP into Rancho Bernardo to be used for landscaping and appropriate industrial uses.
- An adaptation measure that should be addressed in the CAP is the capture of rainwater for reuse as irrigation water. Such systems should be incorporated into all forms of new development, including residential, commercial, and industrial uses.
- Finally, the Climate Action Plan should clearly describe how the City will monitor development and subsequent City Council actions to ensure that the baseline established for “activities covered by the plan” is not altered by land use decisions that result in higher development intensities or significant increases in trip generation. Should the baseline be substantially altered by such decisions, “the level below which the contribution of GHG is not considered cumulative” must be revisited.

AJ-1

**Draft EIR for the draft Action Plan**

- Mitigation measure LU-1 includes appropriate guidance for siting large-scale renewable energy projects; however, it is unclear how development and implementation of these guidelines are actually assured. We would also recommend that these guidelines address the need to minimize impacts related to lighting and glare from these projects. This change should also be reflected in Issue 3 under Visual and Neighborhood Resources in Table ES-1 and in the appropriate section of the final EIR.

AJ-2

Thank you again for the opportunity to provide our comments.

Sincerely,



Mike Lutz  
Chair, Rancho Bernardo Community Planning Board

cc: Councilmember Mark Kersey, District 5

**Response to Comment AJ-2**

Please see Response to Comment AE-4. Mitigation Measure LU-1 has been revised to add minimization of lighting and glare.

# CITY OF SAN DIEGO CLIMATE ACTION PLAN

## Final Program Environmental Impact Report

SCH# 2015021053

November 2015

Prepared for:  
City of San Diego Planning Department  
1010 Second Avenue  
San Diego, California 92101

Prepared by:  
ESA



Mayor Kevin L. Faulconer



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# LIST OF ACRONYMS

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## San Diego Climate Action Plan Final Program Environmental Impact Report

AB	Assembly Bill
ADT	Average Daily Trips
AF	acre-feet
AICUZ	Air Installations Compatible Use Zones
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plans
AMSL	above mean sea level
APCD	Air Pollution Control District
APS	alternative planning strategy
AQMD	Air Quality Management District
ARPA	Archeological Resources Protection Act
ATCM	airborne toxics control measure
BACT	best available control technology
BAU	business-as-usual
BLS	Bureau of Labor Statistics
BMP	best management practices
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
Cal-Am	California American Water Company
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California State Department of Transportation
CAP	Climate Action Plan
CARB	California Air Resources Board
CAS	Climate Change Adaptation Strategy
CBC	California Building Code
CCA	Community Choice Aggregation
CCAT	California Climate Action Team
CCR	California Code of Regulations
C&D	Construction and Demolition
CDFW	California Department of Fish and Wildlife
CDPH	California Department of Public Health
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFC	chlorofluorocarbons
CFL	compact fluorescent lamps
CH <sub>4</sub>	methane
CLUP	Comprehensive Land Use Plan
CMAP	Climate Mitigation and Adaptation Plan

CMP	Congestion Management Program
CNRA	California Natural Resources Agency
CO	Carbon Monoxide
CO <sub>2</sub>	carbon dioxide
CO <sub>2</sub> e	carbon dioxide equivalent
CoSWMP	County Solid Waste Management Plans
CPAP	Climate Protection Action Plan
CPRC	California Public Resources Code
CPTED	Crime Prevention Through Environmental Design
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CWA	Clean Water Act
DOC	Department of Conservation
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
DWR	Department of Water Resources
E&RA	Environmental and Resource Analysis Division
EIR	Environmental Impact Report
EMF	electromagnetic frequency
EO	Executive Order
ESL	Environmentally Sensitive Lands
°F	degrees Fahrenheit
FAA	Federal Aviation Administration
FCAAA	Federal Clean Air Act Amendments
FERC	Federal Energy Regulatory Commission
FIP	Federal Implementation Plan
GSA	groundwater sustainability agency
GHG	greenhouse gas
GWP	global warming potential
HAP	Hazardous Air Pollutant
HFC	hydrofluorocarbons
HOV	High-Occupancy Vehicle
HRB	Historical Resources Board
I-5	Interstate 5
I-8	Interstate 8
IBWC	International Boundary & Water Commission
IP	Internet Protocol
IPCC	International Panel on Climate Change
IRWMP	Integrated Water Management Plan
IWMA	California Integrated Waste Management Act of 1989
IWMP	Integrated Waste Management Plans
LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Program
LDC	Land Development Code
LEA	Local Enforcement Agency
LED	light emitting diode
LNG	liquefied natural gas
LOS	level of service
LOSSAN	Los Angeles to San Diego rail corridor
LVW	loaded vehicle weight
MAP-21	Moving Ahead for Progress in the 21st Century Act
MBTA	Migratory Bird Treaty Act
MCBCP	Marine Corps Base Camp Pendleton

mgd	million gallons per day
MMRP	Mitigation, Monitoring and Reporting Program
MMT	million metric tons
MHPA	Multi-Habitat Planning Area
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MSCP	Multiple Species Conservation Program
MTS	Metropolitan Transit System
MWD	Metropolitan Water District of Southern California
NAAQS	National Ambient Air Quality Standards
NCCP	Natural Community Conservation Planning
NCTD	North County Transit District
NCWRP	North City Water Reclamation Plan
NEPA	National Environmental Policy Act
NESHAP	National Emission Standards for Hazardous Air Pollutant
NHPA	National Historic Preservation Act
NOA	Notice of Availability
NOP	Notice of Preparation
NO <sub>x</sub>	nitrogen oxides
N <sub>2</sub> O	nitrous oxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
OAL	Office of Administrative Law
OPR	Governor's Office of Planning and Research
OSHA	Occupational Safety and Health
PACE	Property-Assessed Clean Energy
PEIR	Program Environmental Impact Report
PFC	perfluorocarbons
PLWTP	Point Loma Wastewater Treatment Plant
PM	particulate matter
POU	publicly owned utility
PPD	pounds per person per day
ppm	parts per million
PRC	Public Resources Code
PUD	Public Utilities Department
PV	solar photovoltaic
RAC	Regional Advisory Committee
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
RCRA	Resource Conservation and Recovery Act of 1976
REC	Renewable Energy Credit
RES	Regional Energy Strategy
ROG	reactive organic gases
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plans
RWMG	Regional Water Management Group
RWQCB	Regional Water Quality Control Board
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SANDAG	San Diego Association of Governments
SB	Senate Bill
SBWRP	South Bay Water Reclamation Plant
SCH	State Clearinghouse

SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDAQMD	San Diego Air Quality Management District
SDCWA	San Diego County Water Authority
SDG&E	San Diego Gas & Electric Company
SDWA	Safe Drinking Water Act
SEMMS	Smart Energy Management & Monitoring System
SF <sub>6</sub>	sulfur hexafluoride
SFHA	Special Flood Hazard Areas
SGMA	Sustainable Groundwater Management Act
SIP	State Implementation Plans
SO <sub>2</sub>	Sulfur dioxide
SR-56	State Route 56
SR-75	State Route 75
SR-94	State Route 94
SR-125	State Route 125
SR-163	State Route 163
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	California State Water Resources Control Board
TAC	toxic air contaminants
TCM	Transportation Control Measures
TDA	California Transportation Development Act
TDM	Traffic Demand Management
TMDL	Total Maximum Daily Load
TPA	Transit Priority Areas
UNFCCC	United Nations Framework Convention on Climate Change
U.S. EPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
WPCP	Water Pollution Control Plan
WTP	Water Treatment Plant
µg	micro grams

# EXECUTIVE SUMMARY

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## A. Introduction

This Program Environmental Impact Report (PEIR) has been prepared by the City of San Diego (City or lead agency) for the City of San Diego Draft Climate Action Plan (CAP) (hereafter referred to as the “proposed Project” or “Project”). This summary provides a brief synopsis of the Project, the results of the environmental analysis contained in this PEIR, and the Project alternatives that were considered.

The California Environmental Quality Act (CEQA) requires that all State and local government agencies consider the environmental consequences of programs and projects over which they have discretionary authority before taking action on those projects or programs. Where there is substantial evidence that a project may have a significant effect on the environment, the agency shall prepare an environmental impact report (EIR) (CEQA *Guidelines* Section 15164[a]). An EIR is an informational document that will inform public agency decision makers and the general public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.

CEQA requires that a Draft EIR be prepared and circulated for public review. Following the close of the public review period, the lead agency prepares a Final EIR, which includes the comments received during the review period (either verbatim or in summary), responses to the significant environmental issues raised in those comments, and any necessary revisions to the Draft EIR. Prior to taking action on a proposed project the lead agency must certify the EIR and make certain findings.

## B. Project Location and Description

The City of San Diego is located within San Diego County in the southwestern corner of California. San Diego County is bordered by the Pacific Ocean on 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. The planning area for the CAP is the City of San Diego General Plan (2008) planning area, which encompasses all land within the city limits and prospective annexation areas. The city includes approximately 332 square miles of land separated into 55 community planning areas.

The CAP has been developed in response to State legislation and policies that are aimed at reducing California’s greenhouse gas (GHG) emissions. This includes Executive Order S-3-05,

which established the 2050 statewide GHG reduction target of 80 percent below 1990 levels, Executive Order B-30-15, which established the 2030 statewide GHG reduction target of 40 percent below 1990 levels, and Assembly Bill 32, the Global Warming Solutions Act, which tasked the California Air Resources Board (CARB) with creating the Climate Change Scoping Plan (Scoping Plan) to establish a 2020 interim target and to provide a path for local governments to contribute their fair share of the GHG emission reductions necessary to achieve the target.

The CAP is intended to ensure the City of San Diego contributes its fair share of GHG reductions through local action. The CAP identifies five primary strategies implemented by 17 actions and 32 supporting measures, which together will meet GHG reduction targets for 2020, as well as an interim target set for 2035. The CAP is a comprehensive document that serves as a framework for City GHG reduction strategies, and that includes requirements for monitoring and periodic updates to ensure the City is achieving its GHG reductions targets.

## C. Project Objectives

The objectives of the CAP are to:

- Provide a roadmap to achieve GHG reductions;
- Conform to California laws and regulations;
- Implement climate action policies of the General Plan;
- Provide CEQA streamlining for GHG emissions from new developments;
- Create green jobs through incentive-based policies, such as the manufacture and installation of solar panels;
- Improve public health by removing harmful pollutants from our air and improve water quality;
- Increase local control over the City's future by reducing dependence on imported water and energy;
- Enhance quality of life by supporting active transportation, planting trees and reducing landfill waste; and
- Save taxpayer money by decreasing municipal water, waste, and energy usage in City-owned buildings.

## D. CEQA Compliance

This Draft PEIR was prepared in compliance with CEQA and the CEQA *Guidelines* (California Code of Regulations, Title 14). As described in CEQA *Guidelines* Section 15121(a), an EIR is a public information document that assesses the potential environmental effects of a project, and that also identifies mitigation measures and alternatives to the project that could reduce or avoid adverse environmental impacts. The CEQA *Guidelines* require that State and local government agencies consider the environmental consequences of a project over which they have discretionary authority. Consequently, the Draft PEIR is an informational document used in the planning and

decision-making process. It is not the purpose of an EIR to recommend either approval or denial of a project. The procedures required by CEQA “are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects (Public Resources Code Section 21002).”

This Draft PEIR was submitted to the State Clearinghouse (SCH # 2015021053) and released for public and agency review on July 31, 2015. The public review period extends for a 60-day period, until September 29, 2015. A copy of the Notice of Preparation dated February 18, 2015, requesting public comment, as well as the written and oral comments received, are included in Appendix A.

## E. Environmental Analysis

The PEIR addresses in detail the following environmental topics: land use, visual and neighborhood resources, air quality, greenhouse gases, historical resources, traffic and circulation, utilities, and water supply. A discussion of topics found not to be significant can be found in Chapter 7, and includes: agricultural resources, biological resources, geologic conditions, health and safety and hazardous materials, hydrology and water quality, mineral resources, noise, paleontological resources, and public services and facilities.

Potentially significant environmental impacts of the proposed Project are summarized in **Table ES-1**. This table lists impacts and mitigation measures in three major categories: significant impacts that would remain significant even with mitigation (significant and unavoidable); significant impacts that could be mitigated to a less than significant level (significant but mitigable); and impacts that would not be significant (less than significant).

For each significant impact, the table includes a summary of feasible mitigation measure(s) and an indication of the level of significance of the impact following implementation of mitigation measures. A complete discussion of each impact and associated mitigation measure is provided in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*.

## F. Significant and Unavoidable Impacts

The Project, if implemented, could result in significant adverse environmental impacts. Mitigation measures proposed as part of the Project or added in this EIR would avoid or reduce most of the impacts to a less-than-significant level (see Table S-1). After mitigation, the following impacts could remain significant, and should be considered an unavoidable consequence of the project:

**Issue B.1: Visual Effects and Neighborhood Character:** Implementation of the CAP could affect the visual quality of the planning area, particularly with respect to views from public viewing areas, vistas, or open spaces.

**Issue B.2: Visual Effects and Neighborhood Character:** Implementation of the CAP could introduce incompatible uses with surrounding development in terms of bulk, scale, materials, or style that would result in adverse visual impacts.

**Issue C.2: Air Quality:** Implementation of the CAP could result in air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations.

**Issue E.1: Historic Resources:** Implementation of the CAP could cause a substantial adverse change in the significance of a historical resource, as defined in Section 15064.5, or have other physical or aesthetic effects to a prehistoric or historic building, structure, object or site.

**Issue F.2: Transportation and Circulation:** Implementation of the CAP could create substantial alterations to present circulation movements including effects on existing public access points and/or resulting from anticipated changes in transportation modes.

## G. Effects Found Not to be Significant

As required by Section 15128 of the CEQA *Guidelines*, an EIR must contain a brief discussion stating the reasons why certain environmental effects of the CAP were determined not to be significant and are therefore not discussed in detail in this PEIR. In accordance with the CEQA *Guidelines*, Chapter 7, Other CEQA Considerations, discusses the environmental issue areas where impacts were found to not be significant. The Project is not expected to have an adverse effect on the environment related to: agricultural resources, biological resources, geologic conditions, health and safety and hazardous materials, hydrology and water quality, mineral resources, noise, paleontological resources, or public services and facilities.

## H. Project Alternatives

Alternatives to the proposed Project are addressed in detail in Chapter 8 of the EIR and are summarized as follows:

- **No Project Alternative** - The No Project Alternative represents a continuation of the City's existing General Plan (adopted in 2008) without the adoption of the Draft Climate Action Plan (see CEQA *Guidelines*, Section 15126(e)(3)(A)).
- **The Climate Mitigation and Adaptation Plan (CMAP) Alternative** – This alternative would substitute another climate action plan that was prepared by the City in 2012, but never adopted. The CMAP Alternative includes somewhat different strategies and actions for reducing GHGs than the CAP.

Based upon the evaluation described in Chapter 8.0, Alternatives, ~~both the No Project Alternative and the CMAP Alternative would have greater~~ fewer impacts related to Land Use, Visual Effects and Neighborhood Character, and Air Quality ~~GHGs~~ than the proposed CAP. Therefore, the CMAP Alternative ~~Project as proposed~~ is considered the Environmentally Superior Alternative.

## I. Major Conclusions, Areas of Controversy, and Issues to be Resolved

The EIR found that the Project would result in significant effects to: Land Use, Visual Effects and Neighborhood Character Resources, Air Quality, Greenhouse Gases, Historical Resources, and Traffic and Circulation. As shown in Table ES-1 below, all impacts identified can be mitigated to a less-than-significant level, except the impacts on Visual Effects and Neighborhood Character, Air Quality, Historical Resources, and Transportation and Circulation.

CEQA *Guidelines* Section 15123 specifies that the EIR summary shall identify “areas of controversy” known to the Lead Agency including issues raised by agencies and the public, and issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.

The City received numerous comment letters and oral comment in response to the NOP. A number of issues were raised. Among these include suggestions to focus CAP actions and strategies such that they provide benefit specifically for environmental justice communities – that is, low income communities and communities of color. Other comments state that CAP actions should be enforceable and should emphasize programs that benefit public health, including reduction of air pollutant emissions other than GHGs.

Issues raised in NOP comments were considered during preparation of this Draft PEIR, in Chapter 3 and in Chapter 8, Alternatives.

**TABLE ES-1  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact and Level of Significance	Mitigation Framework	Level of Significance after Mitigation
<b>A. Land Use</b>		
<p><b>Issue 1:</b> Would implementation of the CAP conflict with applicable land use plans, policies or regulations of an agency with jurisdiction over the Project? (Significant)</p>	<p><b>Mitigation Measure LU-1:</b> Siting of Large-scale Renewable Energy Projects.</p> <p>To ensure that large-scale renewable energy projects are compatible and not in conflict with existing land use and zoning designations, and that any such facilities do not result in conflicts with adjacent land uses, the City shall develop a set of siting guidelines for such facilities <u>prior to permitting any large-scale renewable energy projects</u>. The guidelines shall avoid land use conflicts and contain specific provisions for appropriate siting of large renewable energy facilities to include all of the following <u>at a minimum</u>:</p> <ul style="list-style-type: none"> <li>• A definition of the type and scale of facility that is subject to the siting guidelines. This list may be revised from time to time, as new technologies emerge and evolve.</li> <li>• A matrix table that shows, for each type of facility, the appropriate land use and zoning designations, where siting of facilities would not be expected to cause a significant land use conflict.</li> <li>• Guidelines or best management practices for minimizing conflicts with neighboring land uses. These would include, but not be limited to, required and recommended siting criteria; general design guidelines (such as property line setbacks); minimizing construction and operational noise (such as adherence to Noise Ordinance standards and General Plan compatibility standards); minimizing electromagnetic frequency (EMF) exposure; <del>and</del> minimizing visual prominence (for example, by avoiding siting of facilities on ridgelines and other prominent topographical features, or by providing vegetative screens); <u>and minimizing lighting and glare effects (such as adherence to the City's Outdoor Lighting Regulations)</u>.</li> <li>• The requirement that a facility demonstrate that there are no sensitive biological resources present on-site that would be impacted by development of the proposed large-scale renewable energy facility, or demonstrate compliance with the MSCP Subarea Plan Section 1.4.3, Land Use Adjacency Guidelines, and with the City's ESL Regulations.</li> <li>• The requirement that a facility demonstrate that there are no historical resources present on-site that would be impacted by development of the proposed large-scale renewable energy facility, or demonstrate compliance with Mitigation Framework HIST-1.</li> <li>• A checklist to determine whether, even with adherence to the guidelines provided, a facility may still result in a land use conflict.</li> </ul>	<p>Less than Significant</p>
<p><b>Issue 2:</b> Would implementation of the CAP conflict with the environmental goals, objectives, or recommendations of the General Plan or affected community plans? (Less than Significant)</p>	<p>None required.</p>	<p>Not applicable</p>
<p><b>Issue 3:</b> Would implementation of the CAP result in a conflict with an adopted environmental plan or other approved local, regional or State habitat conservation plan? (Less than Significant)</p>	<p>None required.</p>	<p>Not applicable</p>

**TABLE ES-1 (Continued)**  
**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact and Level of Significance	Mitigation Framework	Level of Significance after Mitigation
<b>B. Visual and Neighborhood Resources</b>		
<b>Issue 1:</b> Would implementation of the CAP affect the visual quality of the planning area, particularly with respect to views from public viewing areas, vistas, or open spaces? (Significant)	Implement <b>Mitigation Measure LU-1</b>	Significant and Unavoidable
<b>Issue 2:</b> Would implementation of the CAP introduce incompatible uses with surrounding development in terms of bulk, scale, materials, or style that would result in adverse visual impacts? (Significant)	Implement <b>Mitigation Measure LU-1</b>	Significant and Unavoidable
<b>Issue 3:</b> Would implementation of the CAP create substantial light or glare which would adversely affect daytime or nighttime views in the area? (Less than Significant)	None required.	Not applicable
<b>C. Air Quality</b>		
<b>Issue 1:</b> Would implementation of the CAP affect the ability of the Regional Air Quality Strategy (RAQS) to meet the federal and state clean air standards, or conflict with implementation of other regional air quality plans? (Less than Significant)	None required.	Not applicable
<b>Issue 2:</b> Would implementation of the CAP result in air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations? (Significant)	<p><b>Mitigation Measure AIR-1:</b> Best Available Control Measures for Construction Emissions</p> <p>This mitigation measure incorporates the Mitigation Framework for construction-related air impacts contained in the General Plan PEIR, which states the following: For projects that may exceed daily construction emissions established by the City of San Diego, Best Available Control Measures will be incorporated to reduce construction emissions to below daily emission standards established by the City of San Diego. Project proponents must prepare and implement a Construction Management Plan which includes but is not limited to Best Available Control Measures. Appropriate control measures will be determined on a project-by-project basis, and are specific to the pollutant for which the daily threshold may be exceeded. Control measures may include:</p> <ul style="list-style-type: none"> <li>• Minimizing simultaneous operation of multiple construction equipment units;</li> <li>• Use of low pollutant emitting equipment;</li> <li>• Use of catalytic reduction for gasoline-powered equipment;</li> <li>• Watering the construction area to minimize fugitive dust; and</li> <li>• Minimizing idling time by construction vehicles.</li> </ul> <p><b>Mitigation Measure AIR-2:</b> Reduce Emissions from Expanded Recycling and Organics Collection Programs</p> <p>To ensure that increased VMT resulting from implementation of CAP Action 4.1 does not result in significant air emissions, collection vehicles shall be converted to alternative fuels, such as natural gas, during roll-out of the expanded program, such that combined emissions fall below the significance threshold for daily and annual NOx emissions. This will be</p>	Significant and Unavoidable

**TABLE ES-1 (Continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact and Level of Significance	Mitigation Framework	Level of Significance after Mitigation
<b>C. Air Quality (cont.)</b>		
<b>Issue 2 (cont.)</b>	confirmed using generally accepted air emissions modeling, such as the CalEEMod model. In addition, to the extent that new programs increase VMT for long-haul vehicles, these vehicles shall also be converted to alternative fuels, such as natural gas, such that any increase falls below the significance threshold for daily and annual NOx emissions.	
<b>D. Greenhouse Gases</b>		
<b>Issue 1:</b> Would implementation of the CAP generate GHG emissions, either directly or indirectly, that may have a cumulatively significant impact on the environment? (Less than Significant)	None required.	Not applicable
<b>Issue 2:</b> Would implementation of the CAP conflict with the GHG reduction targets and measures identified in Governor’s Executive Order S-3-05, Executive Order B-30-15, and CARB’s AB 32 Scoping Plan? (Less than Significant)	None required.	Not applicable
<b>E. Historical Resources</b>		
<b>Issue 1:</b> Would implementation of the CAP cause a substantial adverse change in the significance of a historical resource, as defined in Section 15064.5, or have other physical or aesthetic effects to a prehistoric or historic building, structure, object or site? (Significant)	<p><b>Mitigation Measure HIST-1: Archaeological Resources</b></p> <p>Prior to issuance of any permit for a future development project that could directly affect an archaeological resource, the City shall require the following steps be taken to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, residential and commercial properties, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socio-economic and ethnic backgrounds. Sites may also include resources associated with prehistoric Native American activities.</p> <p><b>Initial Determination</b></p> <p>The likelihood for the project site to contain historical resources shall be determined by reviewing site photographs and existing historic information (e.g. Archaeological Sensitivity Maps, the Archaeological Map Book, and the City’s “Historical Inventory of Important Architects, Structures, and People in San Diego”) and conducting a site visit. If there is any evidence that the site contains archaeological resources, then a historic evaluation consistent with the City’s Historical Resources Guidelines (City Guidelines) would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City Guidelines.</p> <p><b>Step 1:</b> Based on the results of the Initial Determination, if there is evidence that the site contains historical resources, preparation of a historic evaluation is required. The evaluation report would generally include background research, field survey, archeological testing and analysis. Before actual field reconnaissance would occur, background research is required</p>	Significant and Unavoidable

**TABLE ES-1 (Continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact and Level of Significance	Mitigation Framework	Level of Significance after Mitigation
<b>E. Historical Resources (cont.)</b>		
<p><b>Issue 1 (cont.)</b></p>	<p>which includes a record search at the SCIC at San Diego State University and the San Diego Museum of Man. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections shall also be obtained from the San Diego Archaeology Center and any tribal repositories or museums.</p> <p>In addition to the record searches mentioned above, background information may include, but is not limited to: examining primary sources of historical information (e.g., deeds and wills), secondary sources (e.g., local histories and genealogies), Sanborn Fire Maps, and historic cartographic and aerial photograph sources; reviewing previous archeological research in similar areas, models that predict site distribution, and archeological, architectural, and historical site inventory files; and conducting informant interviews. The results of the background information shall be included in the evaluation report.</p> <p>Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet the standards outlined in the City Guidelines. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance, including, but not limited to, remote sensing, ground penetrating radar, and other soil resistivity techniques as determined on a case-by-case basis. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or traditional cultural properties. If through background research and field surveys historical resources are identified, then an evaluation of significance must be performed by a qualified archaeologist. 1</p> <p><b>Step 2:</b> Once a historical resource has been identified, a significance determination must be made. Tribal representatives and/or Native American monitors will be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project in consultation with the Native American representative which could result in a combination of project redesign to avoid and/or preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). An archaeological testing program will be required which includes evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies, including surface and subsurface investigations, can be found in the City Guidelines.</p> <p>The results from the testing program shall be evaluated against the Significance Thresholds found in the City Guidelines. If significant historical resources are identified within the Area of Potential Effect, the site may be eligible for local designation. At this time, the final testing report must be submitted to Historical Resources Board staff for eligibility determination and possible designation. An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found, and site conditions are such that there is no potential for further discoveries, then no further action is</p>	

**TABLE ES-1 (Continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact and Level of Significance	Mitigation Framework	Level of Significance after Mitigation
<b>E. Historical Resources (cont.)</b>		
<p><b>Issue 1 (cont.)</b></p>	<p>required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation (DPR) site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.</p> <p><b>Step 3:</b> Preferred mitigation for historical resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to draft CEQA document distribution. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.</p> <p>A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground-disturbing activities, whenever a Native American Traditional Cultural Property or any archaeological site located on City property or within the Area of Potential Effect of a City project would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions are outlined in the Mitigation Monitoring and Reporting Program (MMRP) included in the environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.</p> <p><b>Step 4:</b> Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the City Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation.</p>	

**TABLE ES-1 (Continued)  
SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact and Level of Significance	Mitigation Framework	Level of Significance after Mitigation
<b>E. Historical Resources (cont.)</b>		
<b>Issue 1 (cont.)</b>	<p>Specific types of historical resource reports are required to document the methods (see Section III of the City Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.</p> <p>Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the City Guidelines), which will be used by Environmental Analysis Section staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover) along with historical resources reports for archaeological sites and traditional cultural properties containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects which result in a substantial collection of artifacts and must address the management and research goals of the project and the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.</p> <p><b>Step 5:</b> For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information, and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards. In the event that a prehistoric and/or historic deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project MMRP. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 and California Native American Graves Protection and Repatriation Act of 2001) and federal (i.e., Native American Graves Protection and Repatriation Act) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.</p> <p>Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing, and/or data recovery report submitted to the</p>	

**TABLE ES-1 (Continued)**  
**SUMMARY OF IMPACTS AND MITIGATION MEASURES**

Impact and Level of Significance	Mitigation Framework	Level of Significance after Mitigation
<b>E. Historical Resources (cont.)</b>		
<b>Issue 1 (cont.)</b>	City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, 36 Code of Federal Regulations 79 of the Federal Register. Additional information regarding curation is provided in Section II of the City Guidelines.	
<b>F. Transportation and Circulation</b>		
<b>Issue 1:</b> Would implementation of the CAP result in a substantial impact upon existing or planned transportation systems?	None required.	Not applicable
<b>Issue 2:</b> Would implementation of the CAP create substantial alterations to present circulation movements including effects on existing public access points and/or resulting from anticipated changes in transportation modes?	<b>Mitigation Measure TR-1:</b> The Roundabouts Master Plan shall include a monitoring and adaptive management program to evaluate, and if necessary, to correct, pedestrian safety issues at operating roundabouts.	Significant and Unavoidable
<b>Issue 3:</b> Would implementation of the CAP conflict with the adopted policies, plans or programs supporting alternative transportation modes (e.g., bus turnouts, trolley extensions, bicycle lanes, bicycle racks, etc.)?	None required.	Not applicable
<b>G. Utilities</b>		
<b>Issue 1:</b> Would implementation of the CAP result in a need for new utility systems, or require substantial alterations to existing infrastructure? (Less than Significant)	None required.	Not applicable
<b>H. Water Supply</b>		
<b>Issue 1:</b> Would implementation of the CAP result in the excessive use of water? (Less than Significant)	<b>Mitigation Measure WS-1: Water Supply Assessment.</b> In order to ensure that large-scale renewable energy projects do not use excessive amounts of water, a Water Supply Assessment (WSA) shall be submitted for review as part of the subsequent environmental review process. The WSA shall demonstrate that the proposed project would not demand an amount of water greater than the amount required by a 500 dwelling unit project.	Less than Significant

# CHAPTER 1

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## Introduction and Environmental Setting

### A. Introduction

This Draft Program Environmental Impact Report (PEIR) has been prepared for the City of San Diego Climate Action Plan (CAP) (hereafter referred to as the “proposed Project” or “Project”). This section describes: (1) the purpose and legal authority of the PEIR; (2) the scope and content of the PEIR; (3) lead, responsible, and trustee agencies; and (4) the environmental review process required under the California Environmental Quality Act (CEQA).

### Purpose and Legal Authority

Pursuant to Section 15060(d) of the California Environmental Quality Act (CEQA), the Environmental and Resource Analysis (E&RA) Division of the City of San Diego Planning Department has determined that the proposed Project may have significant effects on the environment, and the preparation of an Environmental Impact Report (EIR) is required. Approval of the proposed Project requires discretionary actions to be taken by the City of San Diego (City). Therefore, it is subject to the requirements of CEQA. Pursuant to the provisions of CEQA, the City, as lead agency, has determined that the proposed CAP could result in one or more significant effects, and that an EIR must be prepared. In accordance with CEQA *Guidelines* Section 15121, the purpose of this PEIR is to serve as an informational document that:

*...will inform public agency decision-makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.*

### Environmental Review Context

The purpose of this PEIR is to satisfy CEQA requirements by addressing the environmental effects of the proposed CAP. The lead agency has determined that a Program EIR is the appropriate environmental document for this Project because the CAP can be characterized as one large program that governs the interconnected and continued climate-related planning of the entire City.

The CAP is intended to more fully address projected communitywide greenhouse gas (GHG) emissions and provide a plan for reducing such emissions beyond what was previously accomplished with the City’s General Plan and General Plan PEIR. Accordingly, this document is intended as a PEIR, addressing the environmental effects of implementing the proposed Project.

According to the CEQA *Guidelines* (Section 15168(a)), a public agency may prepare a PEIR that can be characterized as one large project or a series of actions that are linked geographically; logical parts of a chain of contemplated events; rules, regulations, or plans that govern the conduct of a continuing program; or individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects that can be mitigated in similar ways.

Under CEQA, a PEIR can function as a first-tier environmental document that assesses and documents the broad environmental impacts of a program with the understanding that a more detailed site-specific review may be required to assess future projects implemented under the program, pursuant to CEQA *Guidelines* Section 15168. The analysis contained in this EIR may also be used as a reference for subsequent environmental review of projects facilitated by implementation of the strategies and actions in the CAP.

The series of actions analyzed in this PEIR includes all GHG reduction strategies and actions contained in the CAP. While the PEIR will identify potential impacts that would result from Project implementation, the analysis is not detailed to the level of site specificity. The PEIR will identify a range of potential impacts resulting from implementation of the CAP and will identify mitigation measures that will reduce identified potentially significant effects, as needed.

Section 15150(a) of the CEQA *Guidelines* states that an EIR:

*...may incorporate by reference all or portions of another document which is a matter of public record or is generally available to the public. Where all or part of another document is incorporated by reference, the incorporated language shall be considered to be set forth in full as part of the text of the EIR...*

CAP Actions 3.1 and 3.6, which call for implementation of the General Plan Mobility Element and City of Villages strategy in transit priority areas as well as implementation of Transit-Oriented Development within Transit Priority Areas were addressed in the previous environmental review contained in the City of San Diego General Plan Program EIR (State Clearinghouse No. 2006091032). Therefore, this PEIR incorporates by reference the General Plan PEIR.

The level of specificity of an EIR is determined by the nature of the project and the rule of reason. As such, the lead agency has outlined in the Notice of Preparation (NOP) the key environmental issues that will be the focus of this PEIR analysis; these are: land use, visual effects and neighborhood character, air quality, greenhouse gases, historic resources, transportation and circulation, utilities, and water supply.

## **Purpose and Function of this PEIR**

This PEIR has been prepared to evaluate the anticipated environmental effects of the proposed Project in conformance with the provisions of CEQA and CEQA Guidelines, as amended. The City of San Diego is lead agency under CEQA, and, as such, is the public agency that has the principal responsibility for carrying out or approving the Project, the CAP. This PEIR was prepared in accordance with CEQA Guidelines Section 15151, which defines the standards for EIR adequacy:

*An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a Project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.*

As stated in the CEQA *Guidelines*, an EIR is an “informational document” intended to inform public agency decision makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. Although this PEIR does not control the ultimate decision on the proposed Project, the City is required by CEQA to consider the information provided in this PEIR. The City will use the PEIR, along with other information and public processes, to determine whether to approve, modify, or disapprove the proposed Project, and to specify any applicable environmental or other conditions of approval as part of Project approval.

The purpose of this PEIR is to provide the City, public agencies, and the public in general with detailed information about the environmental effects of implementing the proposed Project, to examine and institute methods of mitigating any adverse environmental impacts should the Project be approved, and to consider alternatives to the Project as proposed. CEQA provides that public agencies should not approve projects until all feasible means available have been employed to avoid or substantially lessen the significant environmental effects of such projects. “Feasible” means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.

## **Scope of the Environmental Analysis**

The purpose of the analyses contained in this PEIR is to measure the potential environmental impacts that are likely to result from implementation of the policies and reduction strategies contained in the CAP. The proposed CAP is a policy document that provides direction for how GHG emissions should be reduced within the City, and the analysis identifies the potential for implementation of those policies to cause physical changes to the environment.

## **Intended Uses of the PEIR**

### **Future Qualified Greenhouse Gas Reduction Plan CAP Provisions**

CEQA Section 15183.5(b)(1)(A)-(F) provides that a lead agency may determine that a project’s incremental contribution to a cumulative effect is not cumulatively considerable if the project complies with the requirements in a previously adopted plan or mitigation program. That plan for the reduction of GHG emissions should:

- A. Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area;

- B. Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable;
- C. Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area;
- D. Specify measures or a group of measures, including performance standards, that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level;
- E. Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels; and
- F. Be adopted in a public process following environmental review.

~~It is anticipated that with future implementing actions, the City's CAP would serve as a qualified greenhouse gas reduction plan under CEQA Guidelines section 15183.5, and this EIR would be used in the cumulative impacts analysis for later projects, meets the above requirements through the first target year 2020. The City intends to use this PEIR, upon adoption of the CAP, to analyze and mitigate the significant effects of GHG emissions at a programmatic level to reduce GHG emissions, whereby individual projects preparing project-specific environmental documents, if eligible, may tier from and/or incorporate by reference the CAP's programmatic review of GHG impacts in their cumulative impacts analysis.~~

~~The CAP includes a Climate Action Plan Consistency Checklist (CAP Consistency Checklist) that would be used for CEQA tiering to determine whether a project complies with the CAP and may therefore tier from this PEIR for cumulative GHG emissions impacts. The City may modify the CAP Consistency Checklist in the event of changes in the law, scientific discovery, new factual data that alters the common application of the measures or for any other reason deemed necessary by the City. Individual projects that comply with the CAP may still be required to undergo additional environmental review if there is substantial evidence that the particular project may have cumulatively considerable significant impacts (14CCR 15183.5).~~

## **Draft PEIR**

### ***Notice of Preparation***

On February 18, 2015, the City sent a Notice of Preparation (NOP) to responsible, trustee, and federal agencies, as well as to organizations, and individuals potentially interested in the CAP. The NOP is included as **Appendix A** of this Draft PEIR. The NOP requested that agencies with regulatory authority over any aspect of the CAP describe that authority and identify the relevant environmental issues that should be addressed in the PEIR. Interested members of the public were also invited to comment. Responses to the NOP are also included in Appendix A.

A public scoping meeting on the PEIR was held on March 2, 2015. Meeting minutes, which identify the commenters and their concerns, are included in Appendix A.

## **Draft PEIR**

This document constitutes the Draft PEIR. The Draft PEIR contains a description of the CAP, description of the environmental setting, identification of significant environmental impacts and mitigation measures for impacts found to be significant, a brief description of impacts found not to be significant, and an analysis of project alternatives. Upon completion of the Draft PEIR, the City filed a Notice of Completion (NOC) with the Governor's Office of Planning and Research to begin the public review period (CEQA Section 21161).

## **Public Notice and Public Review**

Concurrent with the NOC, the City has provided public notice of the availability (NOA) of the Draft PEIR for public review, and is inviting comment from the general public, agencies, organizations, and other interested parties. The public review period will be sixty (60) days beginning July 31, 2015 and ending on September 29, 2015.

All comments or questions regarding the Draft PEIR should be addressed to:

Rebecca Malone  
Associate Planner  
City of San Diego Planning Department  
1222 First Avenue, MS 501  
San Diego, CA 92101

Or via email to [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov)

## **Final EIR and Project Approval**

Following the public review period, a Final PEIR will be prepared. The Final PEIR will respond to comments on environmental issues that are received during the public review period.

The Final PEIR will be reviewed by the City Council, who will consider the Final PEIR and determine whether it is in compliance with CEQA, and then consider whether to adopt CEQA findings, adopt a statement of overriding considerations, adopt the mitigation monitoring and reporting program (MMRP), and consider whether to approve the proposed Climate Action Plan.

When a public agency approves a project for which an EIR has been certified, which identifies one or more significant environmental effects, CEQA requires that the agency make one or more written findings for each of those significant effects accompanied by a brief explanation of the rationale for each finding (CEQA *Guidelines* Section 15091). The lead agency must find either that the significant impact has been mitigated, that mitigation is the responsibility of another agency that can and should adopt it, or that mitigation is infeasible. Because significant environmental effects have been identified in this EIR, findings will be required for the proposed Project.

At the time of Project approval, the City Council will also consider whether to adopt a statement of overriding considerations. A statement of overriding considerations identifies the reasons why the benefits of the proposed project outweigh the significant adverse environmental impacts of the Project, if there are impacts that cannot be avoided or substantially lessened (CEQA *Guidelines* Section 15093).

CEQA requires that when a public agency makes findings based on an EIR, the public agency must also adopt a MMRP for those measures that it has adopted or made a condition of Project approval in order to mitigate or avoid potentially significant effects on the environment. The City Council would adopt a MMRP to ensure compliance with required mitigation measures during Project implementation (CEQA *Guidelines* Section 15097). The MMRP would be prepared and available for review at the time of the Final PEIR.

Upon considering the Final PEIR and CEQA findings, the Council may then take action to approve, revise, or reject the proposed Climate Action Plan.

### ***Range of Alternatives***

CEQA requires that an EIR discuss a reasonable range of potentially feasible alternatives to the proposed project. This Draft PEIR describes and analyzes a reasonable range of alternatives, including a “No Project” alternative as required under CEQA (CEQA *Guidelines* Section 15126.6[e]); compares the environmental effects of each alternative with the effects of the proposed project; and addresses the relationship of each alternative to the project objectives (see Chapter 5). The final determinations of the lead agency concerning the feasibility, acceptance, or rejection of the alternatives considered in this PEIR would be addressed in the findings when the City Council considers approval of the proposed project, as required by CEQA.

### ***Organization of the Draft PEIR***

**Executive Summary** provides a summary of the CEQA legislation relevant to the Project, generally outlines the PEIR process, provides a brief Project description, and highlights important components of the environmental analysis, including a table listing the Project impacts and mitigation measures.

**Introduction and Environmental Setting** (Chapter 1) defines the purpose, scope and legislative authority of the PEIR, requirements of CEQA, and other pertinent environmental rules and regulations. This section also describes the PEIR process, structure, and required contents, and the PEIR’s relationship to the City’s General Plan PEIR and other environmental documents. The intended uses of the PEIR in streamlining the cumulative effects analysis for subsequent projects consistent with CEQA, with future implementing actions, are also described. This section also generally describes the environmental setting of the Project area, including any key features.

**Project Description** (Chapter 2) provides a description of the CAP and its contents.

**Environmental Impacts and Mitigation Measures** (Chapter 3) contains a description of the environmental setting (existing physical environmental conditions), the regulatory setting, and the environmental impacts that could result from the proposed Project. It includes the thresholds of significance used to determine the significance of adverse environmental effects. This chapter also identifies mitigation measures which would avoid or substantially lessen these significant adverse impacts. The impact discussions disclose the significance of the each impact both with and without implementation of mitigation measures.

**History of Project Changes** (Chapter 4) provides a brief history of the development of the CAP and lists any changes made to the CAP since the publishing of the Notice of Preparation.

**Growth Inducement** (Chapter 5) presents the potential short-term and long-term growth-inducing effects that could result from implementation of the proposed Project.

**Cumulative Impacts** (Chapter 6) presents the analysis of cumulative impacts.

**Other CEQA Considerations** (Chapter 7) presents significant irreversible changes, significant and unavoidable environmental impacts, and effects found to be less than significant.

**Alternatives** (Chapter 8) evaluates a range of reasonable alternatives to the proposed Project and identifies an environmentally superior alternative, consistent with the requirements of CEQA. The alternatives analysis evaluates each alternative's ability to meet the Project objectives and its ability to reduce environmental impacts.

**Certification and Report Authors** (Chapter 9) identifies the authors of the PEIR, and the persons and organizations consulted during preparation of the PEIR.

**References** (Chapter 10) lists the documents and other references consulted during preparation of the PEIR.

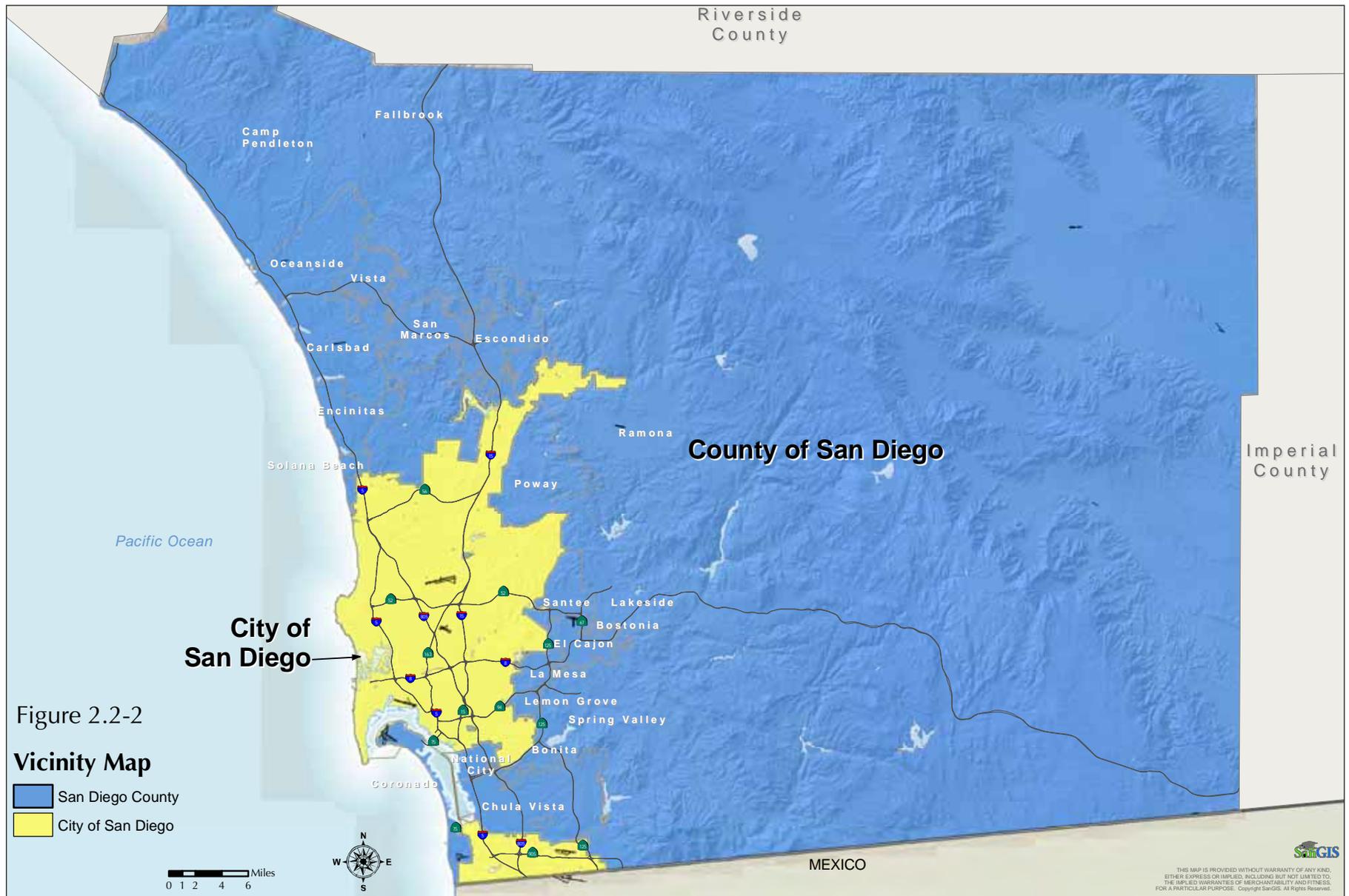
**Mitigation, Monitoring, and Reporting Program** (Chapter 11) describes the procedures, actions, schedule, and responsibility for implementing the mitigation measures in the PEIR.

**Appendix A** contains the NOP, comment letters received on the NOP, comments from the scoping hearing, as well as supporting documents and technical information for the impact analyses.

## B. Environmental Setting

### Regional Location and Access

The City of San Diego is located within San Diego County in the southwestern corner of California (**Figure 1-1**). San Diego County is bordered by the Pacific Ocean on the west, Riverside County to the north, Imperial County to the east, and Orange County at the northwest corner. Like the County, the City's westernmost border is formed by the Pacific Ocean and the southernmost border is formed by the Republic of Mexico and the City of Tijuana. Across the City's northwest border are the coastal communities of the City of Del Mar and the City of Solana Beach, with the northeastern border formed by the Cities of Escondido, Poway, and unincorporated areas of the County. Along its eastern boundary the City is adjacent to the Cities of Santee, La Mesa, Lemon Grove, and additional unincorporated areas. The City's irregular boundary is formed by National City, located just south of the northern portion of San Diego, Chula Vista located just north of San Ysidro, the City's southernmost community, and Imperial Beach to the west. In addition, the City of Coronado lies west of San Diego Bay, which is connected to the City by the San Diego Coronado Bay Bridge.



SOURCE: City of San Diego Draft General Plan Final PEIR, September 2007

San Diego CAP . 140651  
**Figure 1-1**  
 Planning Area Vicinity

San Diego is at the nexus of three interstate highways that provide connectivity to surrounding regions and neighboring states. Interstate 5 (I-5) runs north to south along San Diego's west coast, connecting along the coast towards the greater Los Angeles area and then running northeast through California's Central Valley to Portland, Oregon, and then Seattle, Washington before it reaches the Canadian Border. To the south, I-5 provides the State's primary connection to the Republic of Mexico at the Tijuana border. Interstate 15 (I-15) originates from I-5 near San Diego Bay, just south of Downtown, running north towards the San Bernardino area and then cutting east through the Mojave Desert to the City of Las Vegas, Nevada. Interstate 805 (I-805) provides additional north to south connectivity, branching off from I-5 in the Torrey Hills Community area to cut through the center of the City and then rejoin the I-5 roughly one mile before the border crossing with Mexico. Interstate 8 (I-8) originates near the coastal outlet of the San Diego River and provides east to west connectivity through the City and to unincorporated areas of the County in the east before crossing the state border to Arizona, where it connects to Interstate 10 (I-10) at a point midway between Phoenix and Tucson.

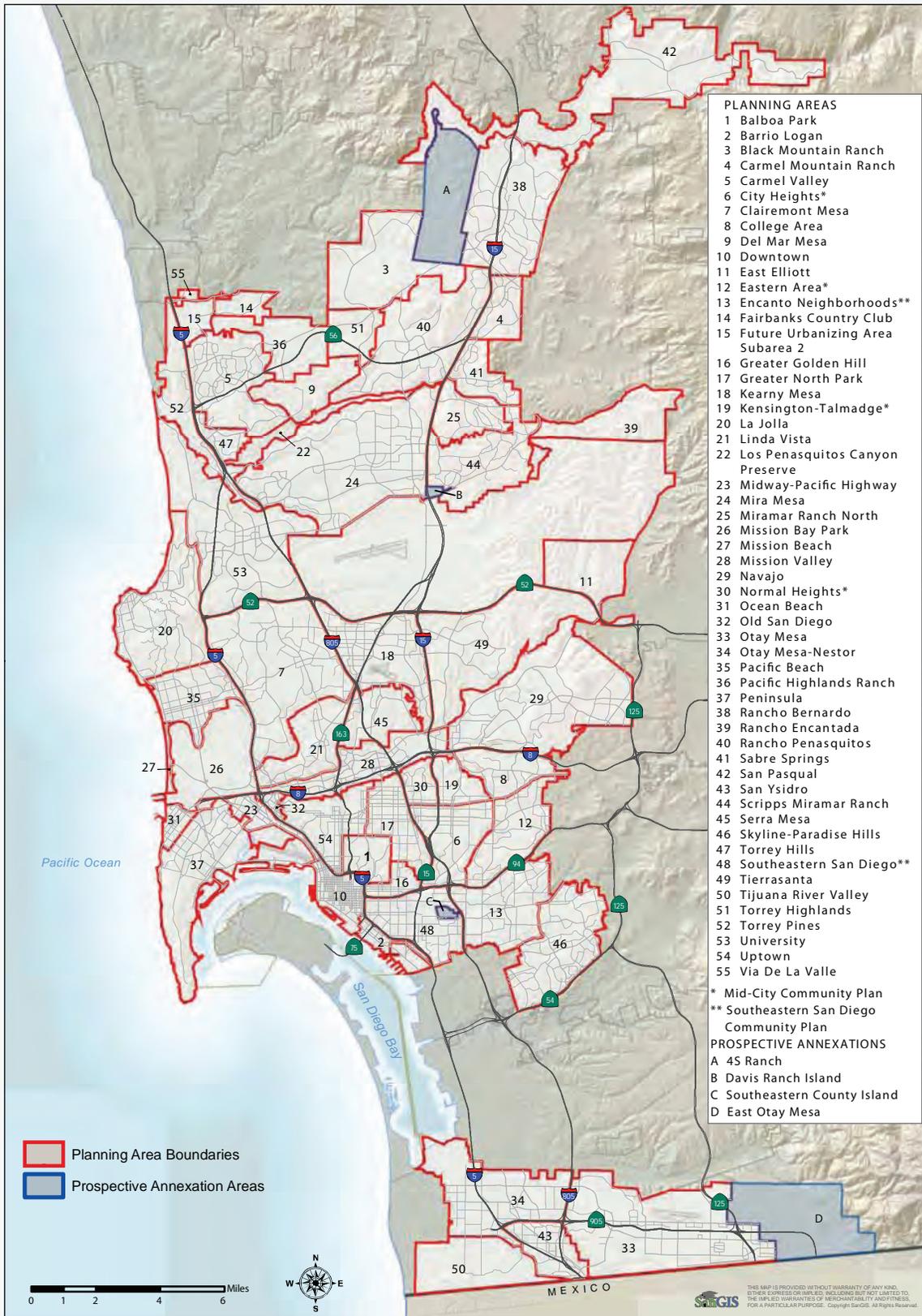
Local connectivity is provided by a series of state routes that connect between the primary interstate highways. State Route 56 (SR-56) runs east to west between I-5 and I-15 in the northern part of the City. State Route 52 (SR-52) runs east to west starting in the Claremont Mesa community area then along the southern border of the East Elliot community area military facilities to connect to the City of Santee in the east. Connectivity to Downtown San Diego is provided by State Route 94 (SR-94) in the east and State Route 163 (SR-163) to the north. State Route 905 (SR-905) provides east to west connectivity through the southernmost community areas of San Diego.

## Planning Area

The planning area for the CAP is the General Plan planning area, which encompasses all land within the city limits and prospective annexation areas, as shown in **Figure 1-2**. The City includes approximately 332 square miles of land separated into 55 community planning areas. The region's topography ranges from beaches along the west to mountains and desert in the east, largely defined by mesa tops intersected by canyon areas.

The major east-to-west canyons form distinct natural and physical barriers, thereby creating unique communities within the greater development scheme. The topography is also defined by several major north-to-south drainages, which include: the San Dieguito River, Los Peñasquitos Canyon, Carroll Canyon, Rose Canyon, San Diego River, Las Chollas Creek, Sweetwater River, Otay River and the westernmost mouth of the Tijuana River. Land surrounding several of the drainages is designated as open space in an effort to minimize future development in the land between each community. This includes the San Dieguito River Valley, Los Peñasquitos Canyon, San Clemente Canyon, and the Otay River Valley.

Other significant features of San Diego's topography include its three marine terraces, which step up the coastal plain west to east towards the inland foothills. Closest to the coast is the La Jolla Terrace, beyond which is the Linda Vista Terrace, the largest of the terraces that contains the "mesa" communities: Mira Mesa, Kearny Mesa, Serra Mesa, Otay Mesa, and Clairemont Mesa. The third terrace, the Poway Terrace, has eroded away and is no longer a distinct landform (City of San Diego, 2007).



SOURCE: City of San Diego Draft General Plan Final PEIR, September 2007

San Diego CAP . 140651

**Figure 1-2**  
**Planning Area**

## Energy Resources

Residents and businesses in the City of San Diego are supplied electricity and natural gas through the San Diego Gas & Electric Company (SDG&E). SDG&E purchases raw energy supplies from various suppliers located outside of the city and transports those energy sources to local plants for processing. SDG&E purchases electricity from the Otay Mesa Energy Center, owned by Calpine, and SDG&E owns and operates the Palomar Energy Center in Escondido. ~~SDG&E produces electricity at the Cabrillo (Encina) and South Bay Power Plants, as well other smaller power plants in the San Diego area.~~ Once the energy is processed, it is sent to customers via SDG&E's system of transmission lines. In 2010, the baseline year of the CAP, SDG&E derived 11 percent of its power from renewable resources including: wind power, solar, small hydroelectric, geothermal, and biomass and waste digestion. SDG&E derived 60 percent of its power from natural gas sources, with nuclear energy providing 16 percent, and coal power providing four percent. The remaining nine percent was derived from untraceable electricity transactions. In June 2013, the San Onofre Nuclear Generating Station ceased operations; and thus, SDG&E no longer has a nuclear energy source (Southern California Edison, 2015).

## Planning Context

### Regional

#### ***SANDAG Regional Transportation Plan and Sustainable Communities Strategy***

The San Diego Association of Governments (SANDAG) was the first Metropolitan Planning Organization (MPO) in California to produce a Sustainable Communities Strategy (SCS) as required by SB 375. Passed in 2008, SB 375 requires each MPO in California to prepare a SCS as a part of its Regional Transportation Plan (RTP). The SCS must demonstrate how regional GHG reduction targets (related to vehicle miles traveled [VMT] from cars and light trucks) would be met through land use patterns, transportation infrastructure investments, and other measures.

According to SANDAG, the GHG targets for the San Diego region call for a seven percent per capita reduction in transportation emissions (from passenger vehicles) by 2020 and a 13 percent per capita reduction by 2035. As part of the action taken to approve the 2050 RTP and its SCS, SANDAG will implement the following early actions:

- Evaluate alternative land use scenarios as part of the Regional Comprehensive Plan (RCP) update to attempt to address the so-called “backsliding” of GHG levels between 2035-2050;
- Develop an early action program for projects included in the Regional Bicycle Plan;
- Plan for the broader Active Transportation program, including Safe Routes to School and Safe Routes to Transit. The Safe Routes to School Capacity Building and Planning Grant Program has awarded six grants of approximately \$50,000 each, for a total of \$279,283, to support planning for comprehensive safe routes to school;
- Implement an action to develop a regional transit-oriented development policy in the 2050 RTP SCS to promote and incentivize sustainable development;

- Continue to make enhancements to the travel demand models; the activity-based models currently under development will be “open source” and available for the next RTP update (SANDAG 2013).

### ***San Diego Unified Port District***

As an environmental steward of San Diego Bay, the Port of San Diego (Port) has adopted a Climate Action Plan providing a long-term strategy to reduce GHG emissions from Port tidelands. The Port’s Climate Action Plan will focus on a variety of actions including transportation, energy efficiency, and alternative energy generation, and will be critical for future planning and development within the Port’s jurisdiction. The Port has also begun efforts to create a long-term vision for climate adaptation to ensure the tidelands are resilient to a changing climate, including rising sea levels (Port of San Diego, 2013).

### ***San Diego County Water Authority***

The City currently receives approximately 85 percent to 90 percent of its water from the San Diego County Water Authority (SDCWA), which obtains water principally from the Metropolitan Water District of Southern California and transferred water from the Imperial Irrigation District. The SDCWA Urban Water Management Plan (UWMP) serves as a long-range planning document for the City’s imported water supply in accordance with the Urban Water Management Act. SDCWA has completed a GHG inventory related to its operations, has developed a CAP, and is partnering with Scripps Institution of Oceanography to integrate impacts of climate change into its long range planning (SDCWA 2010). The City is actively pursuing options to diversify its water supply portfolio. The City Council adopts an UWMP every five years, as is required by the Urban Water Management Act.

## **Local**

### ***City of San Diego General Plan***

The City of San Diego General Plan was adopted in 2008 as the framework for the City’s commitment to long-term conservation, sustainable growth, and resource management. It addresses GHG emission reductions through its City of Villages growth strategy and a wide range of inter-disciplinary policies. General Plan policies related to climate change are integrated throughout the document, and summarized in the Conservation Element in Table CE-1. Policy CE-A.2 in particular aims to “reduce the City’s carbon footprint” and to “develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth” related to climate change. Policy CE-A.13 aims to “regularly monitor, update, and implement the City’s Climate Protection Action Plan, to ensure, at a minimum, compliance with all applicable federal, state, and local laws.”

# CHAPTER 2

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## Project Description

### A. Project Purpose

Former Governor Arnold Schwarzenegger's Executive Order S-3-05 established the 2050 statewide greenhouse gas (GHG) reduction target of 80 percent below 1990 levels, expressing the intent of the State to address the issue of climate change through reducing GHGs. In 2015, Governor Edmund G. Brown, Jr.'s Executive Order B-30-15 established ~~the~~ an interim 2030 statewide GHG reduction target of 40 percent below 1990 levels in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050. In more recent years, California lawmakers have made clear that preventing or mitigating climate change is a key component of the state's sustainable future, and that local governments play a key role in reducing community-wide emissions with their control over local land use planning. Following EO S-3-05, the California legislature passed Assembly Bill 32 (California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32) in 2006, also known as the Global Warming Solutions Act. AB 32 requires the California Air Resources Board (CARB) to design and implement feasible and cost-effective emissions limits, regulations, and other measures, such that statewide GHG emissions are reduced to 1990 levels by 2020 (representing an approximately 15 ~~25~~ percent reduction in current emissions). AB 32 anticipates that the GHG reduction goals will be met, in part, through local government actions. The CARB has identified a GHG reduction target of 15 percent from 2010 levels for local governments (municipal and community-wide) and notes that successful implementation of the plan relies on local governments' land use planning and urban growth decisions as local governments have primary authority to plan, zone, approve, and permit land development to accommodate population growth and the changing needs of their jurisdictions.

Pursuant to AB 32, the CARB adopted a Climate Change Scoping Plan in December 2008 (reapproved by the CARB on August 24, 2011 [CARB 2008]) outlining measures to meet the 2020 GHG reduction goals. In order to meet these goals, California must reduce its GHG emissions by 30 percent below projected 2020 business-as-usual emissions levels or about 15 percent from 2010 levels. The Scoping Plan recommends measures that are worth studying further, and that the State of California may implement, such as new fuel regulations. The Climate Change Scoping Plan Update (CARB 2014) details the progress towards meeting the 2020 reduction goal since the adoption of AB 32, as well as the GHG reduction framework to meet the 80 percent below 1990 levels by 2050. The primary focus areas identified in the Climate Change Scoping Plan Update are associated with energy, transportation, agriculture, water, waste management, natural and working lands, short-lived climate pollutants, green buildings, and cap-and-trade.

While several initiatives at the state level will help reduce GHG emissions, they alone will not be sufficient to meet the 2020 target recommended by CARB. In response to the State's efforts and to ensure the City of San Diego (City) contributes its fair share to statewide GHG reductions, the City has prepared the Climate Action Plan (CAP). The CAP identifies measures to effectively meet GHG reduction targets for 2020, as well as 2035 which serves as an "interim" target between the 2020 target and the state's longer term 2050 target.

This Draft Program Environmental Impact Report (PEIR) addresses the environmental impacts related to implementation of the City of San Diego CAP. CAPs are generally recognized by regional and state agencies as being an important planning tool for reducing emissions at the local level. The City's CAP outlines five strategies supported by actions for reducing municipal and community-wide GHG emissions. The CAP is a comprehensive document that functions as the framework for City GHG reduction strategies for the short, medium, and long term.

## B. History and Relation to the General Plan

The General Plan, adopted in 2008, is the framework for the City's commitment to long-term conservation, sustainable growth, and resource management. It addresses GHG emission reductions through its City of Villages growth strategy and a wide range of inter-disciplinary policies.

The CAP identifies strategies and actions to reduce the City's carbon footprint, consistent with General Plan Policy CE-A.2:

**Policy CE-A.2** to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs and incentives as appropriate to implement the goals and policies set forth" related to climate change.

Consistent with General Plan Policy CE-A.13, the CAP updates and expands upon the first Climate Protection Action Plan (CPAP), which was approved in 2005:

**Policy CE-A.13** to "regularly monitor, update, and implement the City's Climate Protection Action Plan, to ensure, at a minimum, compliance with all applicable federal, state, and local laws. "

The CPAP focused on reducing emissions from municipal operations and was central to fostering heightened awareness and developing "climate change literacy" within the City and the community.

## C. Project Objectives

The objectives of the CAP are to:

- Provide a roadmap to achieve GHG reductions;
- Conform to California laws and regulations;
- Implement climate action policies of the General Plan;
- Provide CEQA streamlining for GHG emissions from new developments;

- Create green jobs through incentive-based policies, such as the manufacture and installation of solar panels;
- Improve public health by removing harmful pollutants from our air and improve water quality;
- Increase local control over the City's future by reducing dependence on imported water and energy;
- Enhance quality of life by supporting active transportation, planting trees and reducing landfill waste; and
- Save taxpayer money by decreasing municipal water, waste, and energy usage in City-owned buildings.

## D. Contents of the CAP

The CAP contains five chapters: Background, Reducing Emissions, Implementation and Monitoring, Social Equity and Job Creation, and Adaptation. Appendices A through ~~EB~~ provide additional detail on topics covered within the CAP. A brief summary of each chapter follows:

- **Chapter 1 – Background:** Provides an introduction and purpose for the creation of the CAP. Specifically, the CAP serves as mitigation for the increased GHG emissions associated with implementation of the City's adopted General Plan as explained in Chapter 1. The General Plan calls for the City to reduce its carbon footprint through actions including adopting new or amended regulations, programs, and incentives. General Plan Policy CE-A.13 specifically identifies the need for an update of the City's 2005 CPAP that identifies actions and programs to reduce the GHG emissions of the community-at-large, and City operations. Additionally, with future implementing actions, it is anticipated that the CAP will serve as a "Qualified GHG Reduction Plan" for purposes of tiering under CEQA through 2020.
- **Chapter 2 – Reducing Emissions:** Delivers a baseline inventory for 2010; emission forecasts for 2020, 2030, and 2035; establishes reduction targets for 2020 and 2035; and identifies federal, state and local measures to reduce emissions that when totaled meet or exceed the 2020 and 2035 targets, putting the City on a trajectory toward achieving statewide 2050 targets.
- **Chapter 3 – Implementation and Monitoring:** Details the implementation action and phasing for individual goals. For each of the five strategies, the CAP identifies goals, actions, targets, supporting measures, parties responsible for implementation and estimated GHG reductions for 2020 and 2035. This chapter also illustrates the contents of the Annual Monitoring Report, including the results of the annual GHG inventory. The City anticipates that new technologies and innovative programs developed in the future can enhance, or even replace, the strategies and actions currently proposed. This consideration will allow the City to be flexible, yet diligent, in its effort to reduce emissions and prepare for a changing climate.
- **Chapter 4 – Social Equity and Job Creation:** Describes how the impacts of climate change will disproportionately affect disadvantaged communities and how the City can proactively identify those communities prior to project implementation. This chapter also illustrates how climate plan policies can lead to the creation of well-paying jobs and actions the City of San Diego is taking to promote economic growth.

- **Chapter 5 - Adaptation:** Identifies climate impacts for San Diego, illustrates current climate adaptation efforts throughout the state, and provides a guide to adaptation strategy development. This chapter then gives recommendations for adaptation strategies by sector, illustrates next steps, and discusses the economic considerations for strategy selection and implementation.
- ~~**Appendix A – Climate Action Plan CEQA Consistency Checklist:** Provides a tool for future projects to assess consistency with the CAP and determine the appropriate level of CEQA streamlining that could occur.~~
- ~~**Appendix B – Glossary of Terms and Acronyms:** Provides a definition for the terms and acronyms used throughout the CAP.~~
- **Appendix ~~CA~~.1 – Methods for Estimating GHG Reductions:** Provides information about the data, methods, and sources used to estimate the greenhouse gas reductions associated with the implementation strategies included in the CAP. Appendix ~~CA~~.1 provides common assumptions used across multiple measures, as well as specific information used to quantify strategies at the state/federal level, regional level, and local actions included within each of the five main strategies.
- **Appendix ~~CA~~.2 – Baseline and Emissions Projection Methods:** Describes the methodology used to estimate greenhouse gas emissions for the 2010 baseline year and the business-as-usual projection for the City of San Diego to estimate the level of emissions in 2020, 2030, and 2035 if no action were taken.
- **Appendix ~~CA~~.3 – Glossary of Terms and Acronyms:** Provides a definition for the terms and acronyms used throughout the CAP. ~~**Climate Adaptation Recommendations:** Provides recommendations concerning: public health and safety, water supply and services, urban infrastructure and community services, environmental health, open space, parks, and recreation, coastal management and protection, urban forest management and local food production, building and occupant readiness, community education, knowledge and collaboration.~~
- **Appendix B – Transit Priority Area Map:** Provides a map based on the SANDAG 2050 Regional Transportation Plan (RTP) displaying areas within one-half mile of a major transportation stop.

## E. CAP GHG Inventory and Reduction Potential

The GHG emissions inventory evaluated energy and emissions related activities within the City of San Diego in the baseline year 2010 for five major sectors, including residential buildings, nonresidential, transportation, water, solid waste, and municipal operations. Such emissions were associated with a variety of sources, including direct combustion of fossil fuels, purchased electricity, transportation (gasoline), solid waste, potable water, and materials. These sources are described in greater detail in Appendix ~~CA~~ of the CAP. The CAP estimates the GHG emissions for the City of San Diego in the baseline year 2010 were approximately 13.0 million metric tons of carbon dioxide equivalent (MMT CO<sub>2</sub>e), of which the largest contributing sector was transportation (~~54~~55 percent), followed by electricity use (24 percent), natural gas use (16 percent), and solid waste and wastewater collection, disposal, and treatment (5 percent). The CAP uses a 2010 baseline pursuant to a recommendation from CARB that local governments set a 2020

reduction target of 15 percent below current emissions. Given the relatively close timeframe, data and information from 2020 provided a reliable baseline of emissions for the City to use to set its reduction targets. The methods used to estimate GHG emissions for 2010 are consistent with the U.S. Community Protocol for Accounting and Reporting of Greenhouse Gas Emissions.

Following direction provided in the CARB Scoping Plan, the CAP determined an estimate of future emissions in the target years under a “business-as-usual” scenario. By 2020 the CAP estimates the City’s emissions would increase to approximately 14.1 MMT CO<sub>2</sub>e, 15.97 MMT CO<sub>2</sub>e in 2030, and to approximately 16.74 MMT CO<sub>2</sub>e by 2035. With implementation of the CAP, the City aims at a minimum to reduce emissions to ~~25~~24 percent below the 2010 baseline by 2020 to approximately 11.04 MMT CO<sub>2</sub>e, to ~~44~~40 percent below the 2010 baseline by 2030 to approximately 7.8 MMT CO<sub>2</sub>e, and by a total of 50 percent below the 2010 baseline by 2035 to approximately 6.5 MMT CO<sub>2</sub>e. With implementation of the CAP, it is anticipated that the City would exceed its reduction target by approximately 1.23 MMT CO<sub>2</sub>e in 2020, ~~176,528~~ 211,196 MT CO<sub>2</sub>e in 2030, and ~~127,136~~ 205,462 MT CO<sub>2</sub>e in 2035. **Table 2-1** summarizes the City’s GHG inventory, projections, and target achievement anticipated through CAP implementation.

**TABLE 2-1  
ESTIMATED GHG REDUCTION POTENTIAL OF CAP STRATEGIES**

Reductions from:	2020 MT CO <sub>2</sub> e	2030 MT CO <sub>2</sub> e	2035 MT CO <sub>2</sub> e
2010 Baseline Emissions	<u>43,019,594</u>	<u>43,019,594</u>	<u>43,019,594</u>
Total Projected Emissions (Business-as-Usual)	<u>44,067,316</u>	<u>45,667,449</u>	<u>46,427,118</u>
Estimated GHG Reductions from CAP	<u>(3,087,445)</u>	<u>(8,065,608)</u>	<u>(10,223,523)</u>
GHG Emissions with Implementation of the CAP	<u>9,791,894</u>	<u>7,635,226</u>	<u>6,382,659</u>
City Target Emissions Levels	<u>11,037,244</u>	<u>7,790,996</u>	<u>6,492,497</u>
<i>Additional Reduction Below City Target</i>	<u>(1,243,500)</u>	<u>(211,196)</u>	<u>(205,462)</u>

SOURCE: City of San Diego, 2015

## F. Greenhouse Gas Reduction Strategies and Actions

The CAP relies on regional actions, continued implementation of federal and state mandates, and local actions for target attainment.

### State and Regional Actions

State and regional actions include regional land use and transportation planning efforts undertaken by the San Diego Association of Governments (SANDAG), pursuant to Senate Bill 375, through their Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), as well as

renewable energy legislation at the state level through the Renewable Portfolio Standard and California Solar Programs. Additional state actions include vehicle fuel efficiency and lowering the carbon content of vehicle fuels. **Table 2-2** shows the GHG reduction potential of regional and state actions that the CAP takes into account. In 2020, 2030, and 2035, a majority of the GHG reductions are associated with actions taken at a regional and state level (90 percent in 2020, 74.85 percent in 2030, and 65.76 percent in 2035).

**TABLE 2-2  
ESTIMATED GHG REDUCTION POTENTIAL OF STATE AND REGIONAL ACTIONS**

Reductions from:	2020 MT CO <sub>2</sub> e		2030 MT CO <sub>2</sub> e		2035 MT CO <sub>2</sub> e	
	Number	Percent	Number	Percent	Number	Percent
SANDAG – RTP/SCS	397,684	<b>9.3</b>	650,194	<b>8.4</b>	794,885	<b>7.9</b>
	<u>397,580</u>	<u>10.2</u>	<u>661,061</u>	<u>9.4</u>	<u>792,801</u>	<u>10.0</u>
	854,144	<b>20.0</b>	739,952	<b>9.4</b>	390,592	<b>3.9</b>
CA Renewable Portfolio Standards	<u>887,084</u>	<u>22.7</u>	<u>840,086</u>	<u>11.9</u>	<u>398,249</u>	<u>5.0</u>
CA RPS – Community Choice Aggregation or Another Program	-	<b>0.0</b>	<u>980,098</u>	<u>13.9</u>	<u>1,592,878</u>	<u>20.2</u>
CA Energy Efficiency Policies and Programs	176,338	<b>4.4</b>	533,412	<b>6.6</b>	752,619	<b>7.5</b>
CA Solar Programs	<u>154,975</u>	<u>4.0</u>	<u>426,262</u>	<u>6.1</u>	<u>572,333</u>	<u>7.2</u>
CA Solar Programs	1,363,898	<b>34.9</b>	2,254,450	<b>28.0</b>	2,347,720	<b>23.4</b>
CA Vehicle Efficiency Standards – Pavley 1/CAFÉ	<u>1,407,061</u>	<u>36.0</u>	<u>2,373,735</u>	<u>33.7</u>	<u>2,498,388</u>	<u>31.6</u>
CA Vehicle Efficiency Standards – Pavley 1/CAFÉ	609,197	<b>14.2</b>	541,815	<b>6.7</b>	534,949	<b>5.3</b>
CA Low Carbon Fuel Standard	<u>628,425</u>	<u>16.1</u>	<u>571,210</u>	<u>8.1</u>	<u>569,268</u>	<u>7.2</u>
CA Low Carbon Fuel Standard	193,675	<b>4.5</b>	741,895	<b>9.2</b>	1,155,929	<b>11.5</b>
CA Electric Vehicle Policies and Programs	<u>196,542</u>	<u>5.0</u>	<u>758,803</u>	<u>10.8</u>	<u>1,185,078</u>	<u>15.0</u>
CA Electric Vehicle Policies and Programs	223,835		475,739	<b>5.9</b>	498,564	<b>5.0</b>
CA Energy Efficiency Policies and Programs	<u>202,142</u>	<u>5.2</u>	<u>387,265</u>	<u>5.5</u>	<u>257,192</u>	<u>3.3</u>
CA CARB Tire Pressure Program	25,920	<b>0.6-0.7</b>	27,840	<b>0.3-0.4</b>	28,800	<b>0.3-0.4</b>
CA CARB Heavy Duty Vehicle Aerodynamics	8,100	<b>0.2</b>	8,700	<b>0.1</b>	9,000	<b>0.1</b>
<b>Total State and Regional Actions</b>	<b>3,852,788</b>	<b>90.4</b>	<b>5,970,997</b>	<b>74.3</b>	<b>6,513,058</b>	<b>64.8</b>
	<u>3,907,829</u>	<u>90.2</u>	<u>7,015,059</u>	<u>84.8</u>	<u>7,903,957</u>	<u>75.8</u>
	<u>422,633</u>	<u>9.9</u>	<u>2,061,277</u>	<u>25.7</u>	<u>3,531,404</u>	<u>35.2</u>
<b>Total Local CAP Reductions</b>	<u>423,116</u>	<u>9.8</u>	<u>1,261,745</u>	<u>15.2</u>	<u>2,525,027</u>	<u>24.2</u>
	<u>4,275,421</u>		<u>8,032,273</u>		<u>10,044,459</u>	
<b>Total CAP Reductions</b>	<u>4,330,945</u>	<b>100.0</b>	<u>8,276,803</u>	<b>100.0</b>	<u>10,428,984</u>	<b>100.0</b>

SOURCE: San Diego, 2015

### **Senate Bill 375 and Transit Priority Areas**

An important regional action that the CAP relies on is the implementation of Senate Bill 375 (SB 375), which establishes mechanisms for the development of regional targets for reducing passenger vehicle greenhouse gas emissions. SB 375 was adopted by the state on September 30, 2008. In compliance with SB 375, SANDAG adopted the 2050 RTP/SCS on October 28, 2011.

The RTP/SCS serves as the region's comprehensive long-range transportation planning document by encouraging public policy decisions that will result in balanced investments for a wide range of multimodal transportation improvements. The RTP/SCS is intended to achieve the goals of SB 375, and can be implemented through existing and planned programs or policies. The RTP/SCS consists of strategies to guide new policies and infrastructure development based on recent household and job growth forecasts, market demand and economic studies, and transportation studies.

For the 2050 RTP/SCS, SANDAG staff worked directly with local jurisdictions to include land use and transportation data into the 2050 Regional Growth Forecast. For the City of San Diego, existing plans were assumed in the 2050 Growth Forecast for most communities, and draft plans were used for Otay Mesa, Barrio Logan, Grantville, and Carol Canyon; more intensive redevelopment was presumed within existing plans in some urban core communities for years 2035-2050.

As outlined in the City's General Plan, future growth would be centered around transportation corridors and urban villages, in "Transit Priority Areas" (TPAs). TPAs are addressed in SB 743 to align regional transportation, land use, housing, and GHG emissions planning through the SCS, which illustrates how SANDAG would meet a GHG reduction target for passenger vehicles established by the CARB. A TPA is an area within a half-mile of high quality transit such as a rail stop or a bus corridor that provides or will provide at least 15-minute frequency service during peak hours by the year 2035. SB 743 defines a TPA as, "an area within half a mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."<sup>1-2,3</sup>

In addition to connecting regional planning processes, SB 375 was also intended to make it easier for communities to expand housing and transportation choices. A key element of SB 375 is the option for regions and their local governments to provide significant CEQA regulatory streamlining incentives for projects in a TPA.

**Figure 2-1** illustrates the TPAs in the SANDAG 2050 RTP/SCS, for the long-term (2035). The CAP projects a reduction of ~~397,681~~ 397,580 MT CO<sub>2</sub>e in 2020, ~~650,194~~ 661,061 MT CO<sub>2</sub>e in 2030, and ~~794,885~~ 792,801 MT CO<sub>2</sub>e in 2035 from the implementation of the SANDAG RTP/SCS.

- <sup>1</sup> Section 450.216 addresses development and content of the Statewide Transportation Improvement Program (STIP). STIPs cover a period of no less than four years.
- <sup>2</sup> Section 450.322 refers to development and content of the Metropolitan Transportation Plan. The RTP has at least a 20-year planning horizon.
- <sup>3</sup> Major Transit Stop, as defined in Section 21064.3, means: "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service of 15 minutes or less during the morning and afternoon peak commute periods."

## Local Actions

The CAP is focused around five primary strategies that would be implemented by 17 actions and 32 supporting measures that include new ordinances, City Council policies, resolutions, programs, incentives, and outreach and education activities and together would amount to the estimated reduction in GHGs. The relationship of the strategies, actions, and supporting measures is described below.

### **Strategy 1: Water & Energy Efficient Buildings**

The goals of Strategy 1, Energy and Water Efficient Buildings, are to reduce energy consumption in residential building and municipal facilities, and to reduce per capita water use. Proposed actions to implement Strategy 1, Energy and Water Efficient Buildings, include the following:

**Action 1.1:** Present to City Council for consideration a Residential Energy Conservation and Disclosure Ordinance.

The target for Action 1.1 is to reduce energy use by 15 percent per unit in 20 percent of residential housing units by 2020 and 50 percent of units by 2035. An ordinance would require single family and multi-family residential property owners to disclose energy use prior to the sale of property. Residential energy efficiency improvements that may be encouraged by the disclosure include: water heater replacement or insulation wrapping; insulation of hot and cold water piping; exterior door weather-stripping; sealing and insulating furnace ducts; retrofitting chimneys with dampers, doors, or closures; installing or replacing ceiling insulation; and replacing incandescent light bulbs with compact fluorescent lamps (CFLs) or light emitting diode (LED) lighting.

**Action 1.2:** Present to City Council for consideration a Municipal Energy Strategy and Implementation Plan.

The target for Action 1.2 is to reduce energy consumption at municipal facilities by 15 percent by 2020 and an additional 25 percent by 2035.

Implementation of a Municipal Energy Strategy would result in energy efficiency improvements to City-owned buildings and facilities. This could include replacing appliances, fixtures, and lighting; improvements to the building envelope; changes to the City's operational policies; and the installation of rooftop and parking lot solar systems.

**Action 1.3:** Support water rate structures that provide pricing signals that encourage water conservation and reuse, including greywater use, within the limits established by Propositions 218 and 26.

The target for Action 1.3 is to reduce daily per capita water consumption by 4 gallons by 2020 and 9 gallons by 2035.

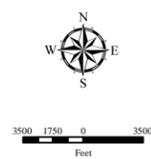
Water rate structures can be used to influence customer's water use behavior and encourage the installation of water efficiency improvements to reduce water bill costs. Such improvements could include replacing toilets, showers, and faucet fixtures; installing efficient irrigation systems; installing landscaping that uses less water; or installing on-site graywater systems.



### Long Term through 2035

#### Legend

- Trolley Stations
- Coaster Station
- Rapid Bus Station
- High Frequency Routes
- Trolley Lines
- Coaster Line
- Transit Priority Area
- Planning Areas
- Municipal Boundaries



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**Action 1.4:** Present to City Council for consideration a Water Conservation and Disclosure Ordinance.

The target for Action 1.4 is to reduce daily per capita water consumption by 4 gallons by 2020 and 9 gallons by 2035.

Similar to a residential conservation and disclosure ordinance, this action would require disclosure of water use prior to sale. The action would encourage improvements such as replacing toilets, showers, and faucet fixtures; installing efficient irrigation systems; installing landscaping that uses less water; or installing on-site graywater systems.

**Action 1.5:** Implement an Outdoor Landscaping Ordinance that requires use of weather-based irrigation controllers.

The target for Action 1.5 is to reduce daily per capita water consumption by an additional 3 gallons by 2020 and an additional 5 gallons by 2035.

An Outdoor Landscaping Ordinance would result in more efficient landscape irrigation systems and could encourage the installation of landscaping that uses less water.

The CAP includes several Supporting Measures for Strategy 1, Energy and Water Efficient Buildings, which include the following:

- Expand the Property-Assessed Clean Energy (PACE) financing programs to further support residential and non-residential energy and water efficiency actions.
- Expand incentive programs that further promote energy and water efficiency in residential and nonresidential buildings.
- Implementation of amendments to the City's Building Code that require installation of cool roof materials consistent with the supplementary measures contained in the CalGreen Code for new construction, significant repairs to existing roofs, and re-roofing.
- Implement a Smart Energy Management & Monitoring System (SEMMS) for municipal facilities to monitor and track energy consumption. Based upon results, staff will identify opportunities for greater efficiency and demand response.
- Develop a Zero Net Energy Policy for new municipal-owned buildings.
- Pursue LEED for Existing Buildings: Operation and Maintenance Certification for municipal facilities.
- Record the annual volume percentage of recycled water used and planned to be introduced through 2035. The report will include plans for increasing future annual volumes of recycled water/potable reuse as well as report the number of grey water permits filed for systems discharging more than 250 gallons per day.
- Pursue additional financial resources and incentives for implementing energy and water efficiency measures identified by the conservation and disclosure ordinances, and to promote the expansion of greywater systems.

## **Strategy 2: Clean & Renewable Energy**

As stated in the CAP, the goal for Strategy 2, Clean and Renewable Energy, is to achieve 100 percent renewable energy supply to the City's electricity grid by the year 2035. Proposed actions to implement this strategy include the following:

**Action 2.1:** Present to City Council for consideration a Community Choice Aggregation (CCA) Program or another program that increases the renewable energy supply on the electrical grid.

The target for Action 2.1 is to add additional renewable electricity supply to achieve 100 percent renewable electricity by 2035 city-wide.

The City's renewable energy program would include presenting an ordinance to City Council to require new residential and non-residential construction to install conduit for future photovoltaic and electric vehicle (EV) charging stations, and to install plumbing for future solar water heating. Further, should the CCA Program or another program not be implemented, the City will explore the option of utilizing renewable energy credits (RECs) to contribute toward the 100 percent renewable energy target.

The CAP includes several Supporting Measures for Action 2.1 Clean and Renewable Energy, which include the following:

- Complete a citywide Community Choice Aggregation Feasibility Study, which would include timelines for implementation and analyze potential costs.
- Implement General Plan Policy CE-A.5 to achieve net zero energy consumption by employing sustainable or "green" building techniques for the construction and operation of buildings.
- Support the State's implementation of the Green Tariff Shared Renewables Program.
- Establish policies, programs and ordinances that facilitate and promote siting of new onsite photovoltaic energy generation and energy storage systems.
- Provide adequate funding and resources to meet increased demand for solar photovoltaic and energy storage permitting.
- Encourage solar photovoltaic installations through implementation of a professional-certification permitting program.

**Action 2.2:** Increase municipal zero emissions vehicles.

The target for Action 2.2 is to increase the number of zero emissions vehicles in the municipal fleet to 50 percent by 2020 and 90 percent by 2035.

This action would involve replacing the City's existing vehicle fleet with zero emission vehicles (ZEVs), which include hydrogen fuel cell electric vehicles, battery electric vehicles and plug-in hybrid electric vehicles. This action would likely require the installation of electric vehicle charging stations and/or hydrogen fueling stations to support the increase in ZEV use.

**Action 2.3:** Present to City Council for consideration a Municipal Alternative Fuel Policy.

The target for Action 2.3 is to achieve 100 percent conversion from diesel fuel used by municipal solid waste collection trucks to compressed natural gas or other alternative low emission fuels by 2035.

This action would involve replacing the City's existing vehicle fleet with zero emission vehicles. This action would likely require the installation of hydrogen or compressed natural gas fueling stations.

### **Strategy 3: Bicycling, Walking, Transit & Land Use**

As stated in the CAP, the goals for Strategy 3, Bicycling, Walking, Transit and Land Use, are to increase the use of mass transit, increase commuter walking and bicycling opportunities, and promote the effective land use to reduce vehicle miles traveled. Proposed actions to implement this strategy include the following:

**Action 3.1:** Implement the General Plan's Mobility Element and the City of Villages strategy in TPAs<sup>4</sup> to increase the use of transit.

The target for Action 3.1 is to achieve mass transit mode share of 12 percent by 2020 and 25 percent by 2035 in TPAs.

The City of Villages strategy is the overarching vision for future land use in the City of San Diego. The strategy would encourage the intensification of land uses in TPAs that would allow more residents to rely on transit for their primary commute mode. The strategy does not specifically assign uses to land in the City, but rather would be implemented with the update and adoption of each community plan.

**Action 3.2:** Implement the City of San Diego's Pedestrian Master Plan in TPAs to increase commuter walking opportunities.

The target for Action 3.2 is to achieve walking commuter mode share of 3 percent by 2020 and 7 percent by 2035 in TPAs. This action would expand pedestrian amenities and facilities, including the extension and improvement of sidewalks, as described in the Pedestrian Master Plan.

**Action 3.3:** Implement the City of San Diego's Bicycle Master Plan to increase commuter bicycling opportunities.

The target for Action 3.3 is to achieve 6 percent bicycle commuter mode share by 2020 and 18 percent mode share by 2035 in TPAs. This action would expand bicycle amenities and facilities, including the extension of bicycle lanes, as described in the Bicycle Master Plan.

**Action 3.4:** Implement a Traffic Signal Master Plan to retime traffic signals to reduce vehicle fuel consumption.

<sup>4</sup> TPAs, shown in Figure 2-1, are based on the adopted SANDAG 2050 Regional Transportation Plan (RTP), which is currently being updated as a part of the San Diego Forward Regional Plan. The Transit Priorities Area map will be updated to reflect the updated RTP following adoption by the SANDAG Board, which is anticipated to occur in the fall of 2015. SB 743 established Section 21099 of the California Public Resources Code (CPRC), which states: "Transit priority area" means "an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations."

The target for Action 3.4 is to retime 200 traffic signals by 2020. This action would involve adjustments to the operation of existing traffic signals.

**Action 3.5:** Implement a Roundabouts Master Plan to install roundabouts to reduce vehicle fuel consumption.

The target for Action 3.5 is to install roundabouts at 15 intersections by 2020 and an additional 20 intersections by 2035.

This action would involve the construction of roundabouts at existing intersections.

**Action 3.6:** Implement transit-oriented development within TPAs.

The target for Action 3.6 is to reduce average vehicle commute distance by two miles through implementation of the General Plan's City of Villages Strategy by 2035.

Similar to Action 3.1, this action would facilitate the implementation of the City of Villages Strategy, which would result in the concentration of new development in TPAs.

The CAP includes several supporting measures for Strategy 3, Bicycling, Walking, Transit and Land Use:

- Implement bicycle improvements concurrent with street re-surfacing projects, including lane diets, green bike lanes, sharrows, and buffered bike lanes.
- Implement a bicycle sharing program with DecoBikes. Reduce the "1 mile" barrier gap by ensuring that further expansion of the bike share program is designed and implemented to reduce the distance needed to travel between transit stops and destinations.
- Identify and address gaps in the City's pedestrian network and opportunities for improved pedestrian crossings, using the City's Pedestrian Master Plan and the City's sidewalk assessment.
- Adopt City portions of SANDAG's forthcoming first mile/last mile initiative and incorporate Safe Routes to Transit strategies in TPAs.
- Coordinate pedestrian counting programs with SANDAG and SDSU Active Transportation Research Programs.
- Develop a Parking Plan to include measures such as "unbundled parking" for nonresidential and residential sectors in urban areas.
- Prepare a Commuter Report with measures to increase commuting by transit for City employees.
- Achieve better walkability and transit-supportive densities by locating a majority of all new residential development within TPAs.
- Develop a new priority ranking for infrastructure improvements in TPAs that will be integrated into Capital Improvement Priority Matrix, Community Development Block Grant opportunities and Public Facilities Financing Plans.
- Implement infrastructure improvements to facilitate alternative transportation modes for all travel trips, in addition to commuting.

- Present to City Council for consideration an Electric Vehicle Charging Plan.

#### **Strategy 4: Zero Waste**

As stated in the CAP, the goals for Strategy 4, Zero Waste include increasing diversion of solid waste and increasing capture of methane gas from landfills and wastewater treatment plants.

Proposed actions to implement this strategy include the following:

**Action 4.1:** Present to City Council for consideration a Zero Waste Plan, and implement landfill gas collection operational procedures in compliance with the California Air Resources Board’s Landfill Methane Capture regulations.

The target for Action 4.1 is to divert 75 percent of solid waste by 2020 and 90 percent by 2035 and capture 80 percent of remaining landfill emissions by 2020 and 90 percent by 2035.

**Action 4.2:** Implement operational procedures to capture methane gas from wastewater treatment.

The target for Action 4.2 is to capture 98 percent of wastewater treatment gases by 2035.

The CAP includes several supporting measures for Strategy 4, Zero Waste:

- Develop a Resource Recovery Center and “one-stop shop” at Miramar Landfill that provides opportunities to maximize waste diversion.
- Convert curbside recycling and curbside greenery collection programs to a weekly basis and add kitchen scraps to greenery.

#### **Strategy 5: Climate Resiliency**

As stated in the CAP the goal for Strategy 5, Climate Resiliency is to increase the urban tree canopy coverage. Proposed actions to implement this strategy include the following:

**Action 5.1:** Present to City Council for consideration a city-wide Urban Tree Planting Program.

The target for Action 5.1 is to achieve 15 percent urban tree canopy coverage by 2020 and 35 percent urban tree coverage by 2035. The program would include water conservation measures to minimize water use for tree plantings. The measures would include planting drought-tolerant and native trees, and prioritizing tree planting in areas with recycled water and greywater infrastructure.

The CAP includes several supporting measures for Strategy 5, Climate Resiliency:

- Develop a regional (Western San Diego County) Urban Tree Canopy Assessment in collaboration with other regional jurisdictions and SANDAG.
- Prepare a Parks Master Plan that prioritizes parks in underserved communities.
- Hire an Urban Forest Program Manager.
- Plan for the long-term maintenance of additional trees and ensure sufficient staff and funding are available.
- Complete the Urban Forest Management Plan and present to City Council for adoption.

**Table 2-3** shows the GHG reduction potential of the CAP strategies and actions. The GHG reduction potential of supporting measures is not quantified; rather, it is assumed that the supporting measures would support implementation of and therefore contribute to the GHG reduction potential of the strategies and actions.

**TABLE 2-3  
ESTIMATED GHG REDUCTION POTENTIAL OF LOCAL STRATEGIES**

Reductions from:	2020 MT CO <sub>2</sub> e		2030 MT CO <sub>2</sub> e		2035 MT CO <sub>2</sub> e	
	Number	Percent	Number	Percent	Number	Percent
<b>Strategy 1: Water &amp; Energy Efficient Buildings</b>	<b>41,334</b> <b>41,615</b>	<b>9.8</b> <b>9.9</b>	<b>53,650</b> <b>55,133</b>	<b>2.6</b> <b>4.4</b>	<b>47,019</b> <b>49,016</b>	<b>4.3</b> <b>1.9</b>
1.1 Residential Energy Conservation, and Disclosure and Benchmarking Ordinance	<del>3,195</del> <u>3,218</u>		<del>5,840</del> <u>6,078</u>	<del>0.3</del> <u>0.5</u>	<del>5,374</del> <u>5,605</u>	<del></del> 0.2
1.2 City of San Diego's Municipal Energy Strategy and Implementation Plan	<del>11,457</del> <u>11,580</u>		<del>11,882</del> <u>12,321</u>	<del>0.6</del> <u>1.0</u>	<del>8,389</del> <u>9,011</u>	<del>0.2</del> <u>0.4</u>
1.3 New Water Rate and Billing Structure	<del>12,096</del> <u>12,210</u>		<del>14,509</del> <u>14,948</u>	<del>0.7</del> <u>1.2</u>	<del>11,657</del> <u>12,277</u>	<del>0.3</del> <u>0.5</u>
1.4 Water Conservation, Disclosure and Benchmarking Ordinance	<del>12,527</del> <u>12,589</u>		<del>19,649</del> <u>19,898</u>	<del>1.0</del> <u>1.6</u>	<del>21,113</del> <u>21,470</u>	<del>0.6</del> <u>0.9</u>
1.5 Outdoor Landscaping Ordinance	<del>2,059</del> <u>2,090</u>		<del>1,770</del> <u>1,888</u>	<del></del> <u>0.1</u>	<del>486</del> <u>653</u>	<del></del> 0.0
<b>Strategy 2: Clean &amp; Renewable Energy</b>	<b>14,162</b>	<b>3.4</b> <b>3.3</b>	<b>1,314,955</b> <b>558,376</b>	<b>63.8</b> <b>44.3</b>	<b>2,635,047</b> <b>1,624,881</b>	<b>74.6</b> <b>64.4</b>
2.1 Community Choice Aggregation Program or Another Similar Program	0	0.0	<del>1,287,833</del> <u>531,254</u>	<del>62.5</del> <u>42.1</u>	<del>2,603,944</del> <u>1,592,878</u>	<del>73.7</del> <u>63.1</u>
2.2 Municipal Zero Emissions Vehicles	12,144	<del>2.9</del> <u>2.8</u>		<del>0.9</del> <u>1.5</u>		<del>0.6</del> <u>0.9</u>
2.3 Convert Municipal Waste Collection Trucks to Low Emission Fuel	2,018	0.5	8,501	<del>0.4</del> <u>0.7</u>	10,144	<del>0.3</del> <u>0.4</u>
<b>Strategy 3: Bicycling, Walking, Transit &amp; Land Use</b>	<b>152,407</b> <b>152,537</b>	<b>36.1</b>	<b>308,556</b> <b>264,130</b>	<b>15.0</b> <b>20.9</b>	<b>383,197</b> <b>385,891</b>	<b>40.9</b> <b>15.3</b>
3.1 Mass Transit	<del>119,132</del> <u>119,234</u>		<del>182,727</del> <u>138,026</u>	<del>8.9</del> <u>10.9</u>	<del>241,490</del> <u>213,573</u>	<del>6.0</del> <u>8.5</u>
3.2 Commuter Walking	<del>1,094</del> <u>1,092</u>		<del>1,334</del> <u>1,338</u>	<del></del> <u>0.1</u>	<del>1,474</del> <u>1,488</u>	<del>0.0</del> <u>0.1</u>
3.3 Commuter Bicycling	<del>19,064</del> <u>19,077</u>		<del>39,964</del> <u>40,177</u>	<del>1.9</del> <u>3.2</u>	<del>50,084</del> <u>50,574</u>	<del>1.4</del> <u>2.0</u>
3.4 Retiming Traffic Signals	<del>11,014</del> <u>11,024</u>		<del>8,983</del> <u>9,032</u>	<del>0.4</del> <u>0.7</u>	<del>8,425</del> <u>8,508</u>	<del>0.2</del> <u>0.3</u>
3.5 Install Roundabouts	<del>2,409</del> <u>2,110</u>		<del>2,503</del> <u>2,506</u>	<del>0.1</del> <u>0.2</u>	<del>2,154</del> <u>2,172</u>	<del></del> 0.1
3.6 Promote Effective Land Use to Reduce Vehicle Miles Traveled	0	0.0	73,051	<del>3.5</del> <u>5.8</u>	109,576	<del>3.4</del> <u>4.3</u>

**TABLE 2-3 (Continued)**  
**ESTIMATED GHG REDUCTION POTENTIAL OF LOCAL STRATEGIES**

Reductions from:	2020 MT CO <sub>2</sub> e		2030 MT CO <sub>2</sub> e		2035 MT CO <sub>2</sub> e	
	Number	Percent	Number	Percent	Number	Percent
<b>Strategy 4: Zero Waste</b>	<b>170,891</b>	<b>40.4</b>	<b>301,309</b>	<del>44.6</del> <b>23.9</b>	<b>362,948</b>	<del>40.3</del> <b>14.4</b>
4.1 Divert Solid Waste and Capture Landfill Emissions	154,467	36.5	283,309	43.7 <u>22.5</u>	344,213	9.7 <u>13.6</u>
4.2 Capture Methane from Wastewater Treatment	16,424	3.9	18,000	0.9 <u>1.4</u>	18,735	0.5 <u>0.8</u>
<b>Strategy 5: Climate Resiliency</b>	<b>43,839</b>	<b>10.4</b>	<b>82,806</b>	<del>4.0</del> <b>6.6</b>	<b>102,290</b>	<del>2.9</del> <b>4.1</b>
5.1 Urban Tree Planting Program	43,839	10.4	82,806	4.0 <u>6.6</u>	102,290	2.9 <u>4.1</u>
<b>Total Local Reductions</b>	<del>422,633</del> <b>423,116</b>	<b>100</b>	<del>2,061,277</del> <b>1,261,745</b>	<b>100</b>	<del>3,531,404</del> <b>2,525,027</b>	<b>100</b>

SOURCE: City of San Diego, 2015

As shown in the table, in 2020 over half of the anticipated reductions are attributed to transportation-related measures, including the expansion of electric vehicle charging infrastructure, mass transit service, and bicycle commuter amenities. Other significant local actions in 2020 include implementation of a zero waste strategy (40 percent of total local actions). In 2020, energy related programs make up a relatively small portion of the total local reductions; however, in 2035 the City anticipates that over half of the GHG reductions would be attributed to switching to low carbon energy sources through a CCA Program, large scale renewable energy development, or other method.

## G. CAP Implementation

Implementation of the CAP is planned to occur over three separate phases that take advantage of easy short term actions to meet the 2020 target and then build up to more complex solutions as the 2035 target approaches.

- **Phase 1: Early Actions** (January 1, 2015-December 31, 2017) – Short-term actions that are high priority with large emissions reductions that would lay the foundation for longer-term actions.
- **Phase 2: Mid-Term Actions** (January 1, 2018-December 31, 2020) – Actions specifically focused on helping the City reach its 2020 GHG Emissions Reduction Target.
- **Phase 3: Longer-Term Actions** (2021-2035) – Actions focused on helping the City reach its 2035 GHG Emissions Reduction Target.

## H. CAP Monitoring and Reporting

The City is responsible for CAP implementation and with future implementing actions, ensuring that GHG emissions reductions are consistent with the level needed for CEQA tiering of development projects, pursuant to the CEQA Guidelines Section 15183.5, to remain valid. This includes ensuring that growth assumptions used in the CAP to forecast future emissions are not exceeded. These assumptions are summarized in **Table 2-4** below (based on Table 2 of the CAP Appendix A). ~~If total population, housing units, or commercial building area exceeds these projections, then project level CEQA streamlining of GHG emissions may no longer be valid.~~

**TABLE 2-4  
GROWTH ASSUMPTIONS USED IN THE CITY OF SAN DIEGO CLIMATE ACTION PLAN**

Data Category	2010	2020	2035
Population	1,359,578	1,542,324	1,759,271
Single Family Housing Units	280,455	286,261	277,679
Multi-Family Housing Units	233,383	286,675	374,215
Commercial Building Area (Million Square Feet)	291	328	398

SOURCE: City of San Diego 2015a.

The CAP includes the following monitoring and reporting responsibilities for ensuring effective implementation of the CAP, and with future implementing actions, for ensuring that the CAP would remains qualified for use with later activities under CEQA Guidelines Section 15183.5(b)(2) ~~and the CAP Consistency Checklist remains valid~~. The City of San Diego is the designated lead agency for the existing Mitigation Monitoring and Reporting Program (MMRP) for the General Plan. The MMRP is used in preparing the Annual Monitoring Report to the City Council on the status of the City's progress in implementing the General Plan.<sup>5</sup> The CAP Annual Monitoring Report will include data, discussion, and conclusions regarding the CAP monitoring activities below.

- The City CAP Implementation Program Manager will oversee the implementation and monitoring of all actions outlined in the CAP.
- Staff will conduct an inventory of community-wide GHG emissions and develop an Annual Monitoring Report that will include specific actions, proposed outcomes and a timeline with milestones to track success in meeting 2020 and 2035 targets, and will require amendment of the CAP if it is not achieving the GHG emissions reductions outlined in the CAP, or where otherwise required by law.
- Staff will annually evaluate city policies, plans and codes (including the CAP) as needed to ensure the CAP reduction targets are met. Any actions requiring City Council approval will be brought back to City Council for consideration.

<sup>5</sup> See Table CE-1 in MMRP: Issues Related to Climate Change Addressed in the General Plan

- The City’s Environmental Services Department will complete an annual carbon (GHG) inventory as part of the Annual Monitoring Report to be verified through a third-party to ensure it is accurate and complete.
- The Annual Monitoring Report will track the effect of CAP’s actions and programs on local employment to the extent feasible. Staff will follow the methodology for employment data collection used by the Bureau of Labor Statistics (BLS) green jobs initiative. Staff will collect data from the Quarterly Census of Employment and Wages and Occupational Employment Statistics programs.
- ~~City will evaluate the CAP and the CAP Consistency Review Checklist every 5 years (at minimum) to determine whether updates are necessary.~~

## ~~I. Greenhouse Gas Emission Screening Criteria~~

### ~~City of San Diego Draft Screening Criteria for Greenhouse Gas Emissions~~

~~As a companion document to the CAP, the City has prepared screening criteria for GHG emissions generated by future projects. The purpose of the screening criteria is to provide guidance to City staff conducting CEQA review to ensure a consistent and objective evaluation of the potential for significant effects from proposed projects that will result in the emission of GHGs. This “bright-line” numeric screening criterion for annual operational emissions will be used to assess whether a project conflicts with existing California legislation adopted to reduce statewide anthropogenic GHG emissions, based on substantial evidence demonstrating that a defined level of project emissions would make a considerable contribution to the cumulative impact on GHG emissions. A screening criterion would be used to determine if modeled emissions would have a less than significant cumulative impact. Emissions above the screening criterion would need to complete the CAP Consistency Checklist to determine if the impact is significant. The City’s Draft Greenhouse Gas Emission Screening Criteria includes a table of development types that would fall below this numeric screening criterion (City of San Diego, 2015b).~~

## ~~J. Required Approvals~~

~~The City will decide whether to certify the PEIR and adopt the proposed project (the Climate Action Plan). There are no other required agency approvals as these are policy matters for the City. Some of the implementing actions of the CAP may involve other agencies, such as SANDAG, concerning expanded transit service, or other local jurisdictions regarding the development of potential renewable energy projects, but such actions will require additional project-level CEQA evaluation at which time such agencies would be involved as a lead or approving agency.~~

## **KJ. Potential for Environmental Impacts**

One of the purposes of this PEIR is to determine if implementation of the CAP could result in significant adverse impacts on the environment. As a way of framing the environmental analysis for Chapter 2, Environmental Setting, Impacts, and Mitigation Measures, **Table 2-5** provides a summary of the potential for each proposed CAP action to cause an adverse physical impact on the environment, and shows the CEQA environmental topic areas potentially affected. In each section of Chapter 2, Environmental Setting, Impacts, and Mitigation Measures, the impact analysis focuses on those CAP actions that are shown in Table 2-5 as having a potential to cause adverse impacts on the environmental issue area being examined. Chapter 6, Other CEQA Considerations, includes a brief discussion of each environmental issue area that is not expected to be adversely affected by implementation of any of the CAP actions.

**TABLE 2-5  
MATRIX OF CAP ACTIONS/POTENTIAL FOR ENVIRONMENTAL EFFECTS**

CAP Strategies/Actions	Target	Potential Physical Changes to the Environment	Environmental Issue Areas Potentially Affected
<b>Strategy 1: Water &amp; Energy Efficient Buildings</b>			
Action 1.1 Residential Energy Conservation and Disclosure Ordinance	Reduce energy use by 15 percent per unit in 20 percent of residential housing units by 2020 and 50 percent of units by 2035.	Minor changes to existing residences, including insulation, weather stripping, cool roofing; and use of energy and water conserving design, materials and appliances in new construction; generally would require ministerial approval only.	<ul style="list-style-type: none"> <li>Historical Resources</li> </ul>
Action 1.2: City of San Diego's Municipal Energy Strategy and Implementation Plan	Reduce energy consumption at municipal facilities by 15 percent by 2020 and an additional 25 percent by 2035.	Retrofitting of existing municipal facilities and incorporation of energy saving design, materials, and appliances in new construction, would not increase potential for new or retrofit construction to cause adverse physical environmental changes.	None
Action 1.3 New Water Rate and Billing Structure	Reduce daily per capita water consumption by 4 gallons by 2020 and 9 gallons by 2035 from a potential new water rate billing structure	New and expanded water conservation measures would result in minor modifications to existing construction (such as installation of water-conserving appliances) and additional requirements for new construction. Would encourage use of water-conserving landscaping. Would increase use of greywater systems for irrigation of landscaping, which could have long-term and cumulative effect on soil and groundwater.	<ul style="list-style-type: none"> <li>Geology and Soils</li> <li>Hydrology and Water Quality</li> </ul>
Action 1.4 Water Conservation and Disclosure Ordinance	Reduce daily per capita water consumption by 4 gallons by 2020 and 9 gallons by 2035.	See Action 1.3	See Action 1.3
Action 1.5 Outdoor Landscaping Ordinance	Reduce daily per capita water consumption by an additional 3 gallons by 2020 and an additional 5 gallons by 2035.	May require construction of new or expansion of existing water recycling facilities and infrastructure, including potential modifications to wastewater treatment plants, installation of recycled water delivery systems, monitoring systems, etc.	<ul style="list-style-type: none"> <li>Utilities and Service Systems</li> <li>Air quality</li> <li>Traffic and Transportation</li> <li>Hydrology and Water Quality</li> </ul>
<b>Strategy 2: Clean &amp; Renewable Energy</b>			
Action 2.1 Community Choice Aggregation Program or <u>Another Similar Program</u>	Add additional renewable electricity supply to achieve 100 percent renewable electricity by 2035 city-wide including 19 percent net metered and shared solar by 2035	Would require the construction of distributed generation (small-scale renewables) on new and existing buildings, including solar photovoltaics, wind-turbines, and energy storage solutions. May directly or indirectly require the construction of large-scale renewable energy generation systems within or outside of the City to satisfy large demand. May therefore result in construction-related impacts (air quality, GHGs, traffic, noise), effects on visual quality (coastal views, hillsides, near open space areas, scenic highways); footprint effects associated with greenfield development, including biological, hydrologic, and cultural resources impacts.	<ul style="list-style-type: none"> <li>Air quality</li> <li>GHGs</li> <li>Traffic and Circulation</li> <li>Visual Effects and Neighborhood Character</li> <li>Biological Resources</li> <li>Hydrology and Water Quality</li> <li>Historical and Cultural Resources</li> <li>Growth Inducement</li> </ul>

**TABLE 2-5 (Continued)**  
**MATRIX OF CAP ACTIONS/POTENTIAL FOR ENVIRONMENTAL EFFECTS**

<b>CAP Strategies/Actions</b>	<b>Target</b>	<b>Potential Physical Changes to the Environment</b>	<b>Environmental Issue Areas Potentially Affected</b>
<b>Strategy 2: Clean &amp; Renewable Energy (cont.)</b>			
Action 2.2 Municipal Zero Emissions Vehicles	Increase the number of zero emissions vehicles in the municipal fleet to 50 percent by 2020 and 90 percent by 2035.	Generally minor construction-related effects (air quality, GHGs, traffic, noise, stormwater) within the built environment associated with development of electrical charging and other fueling infrastructure.	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• GHGs</li> <li>• Noise</li> <li>• Hydrology and Water Quality</li> <li>• Traffic and Circulation</li> </ul>
Action 2.3 Convert Municipal Waste Collection Trucks to Low Emission Fuel	100 percent conversion from diesel fuel used by municipal solid waste collection trucks to compressed natural gas or other alternative low emission fuels by 2035.	Generally minor construction-related impacts (air quality, traffic, noise, stormwater) associated with development of electrical charging and other fueling infrastructure.	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• GHGs</li> <li>• Noise</li> <li>• Hydrology and Water Quality</li> <li>• Traffic and Circulation</li> </ul>
<b>Strategy 3: Bicycling, Walking, Transit &amp; Land Use</b>			
3.1 Implement General Plan Mobility Element and City of Villages Strategy in Transit Priority Areas	Achieve mass transit mode share of 12 percent by 2020 and 25 percent by 2035 in TPAs.	Development of new and extended mass transit infrastructure and service, resulting in construction-related impacts, change to land use and the character of the urban environment, and operational impacts.	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• GHGs</li> <li>• Noise</li> <li>• Hydrology and Water Quality</li> <li>• Traffic and Circulation</li> <li>• Land Use</li> <li>• Visual Impacts and Neighborhood Character</li> <li>• Historical and Cultural Resources</li> <li>• Biological Resources</li> <li>• Growth Inducement</li> </ul>
3.2 Implement the City's Pedestrian Master Plan in Transit Priority Areas	Achieve walking commuter mode share of 3 percent by 2020 and 7 percent by 2035 in TPA.	Implementation of the City's Pedestrian Master Plan, including renovations and retrofits of existing sidewalks, cross-walks, and pedestrian trails as well of construction of new pedestrian facilities may result in short-term construction related impacts, and changes to circulation and to neighborhood character.	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• GHGs</li> <li>• Noise</li> <li>• Hydrology and Water Quality</li> <li>• Traffic and Circulation</li> <li>• Visual Resources and Neighborhood Character</li> </ul>
3.3 Implement the City's Bicycle Master Plan	Achieve 6 percent bicycle commuter mode share by 2020 and 18 percent mode share by 2035 in TPAs.	Implementation of the City's Bicycle Master Plan, including renovations and retrofits of existing bike lanes and construction of new bike lanes and facilities, may result in short-term construction impacts and long-term effects on traffic and circulation and neighborhood character.	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• GHGs</li> <li>• Noise</li> <li>• Hydrology and Water Quality</li> <li>• Traffic and Circulation</li> <li>• Visual Resources and Neighborhood Character</li> </ul>
3.4 Implement a Traffic Signal Master Plan	Retime 200 traffic signals by 2020.	Adjustment to programming of existing traffic signals	None.

**TABLE 2-5 (Continued)**  
**MATRIX OF CAP ACTIONS/POTENTIAL FOR ENVIRONMENTAL EFFECTS**

CAP Strategies/Actions	Target	Potential Physical Changes to the Environment	Environmental Issue Areas Potentially Affected
<b>Strategy 3: Bicycling, Walking, Transit &amp; Land Use (cont.)</b>			
3.5 Implement a Roundabouts Master Plan	Install roundabouts at 15 intersections by 2020 and an additional 20 intersections by 2035.	Short-term construction impacts, operational changes to traffic circulation. May affect visual resources and neighborhood character through introduction of change to streetscape.	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• GHGs</li> <li>• Noise</li> <li>• Hydrology and Water Quality</li> <li>• Traffic and Circulation</li> <li>• Visual Resources and Neighborhood Character</li> </ul>
3.6 Implement Transit-Oriented Development within Transit Priority Areas	Reduce average vehicle commute distance by two miles through implementation of the General Plan City of Villages Strategy by 2035.	Implementation of City of Villages Strategy would result in new development at a higher density than existing development, especially near transit corridors. Short-term construction impacts and long-term changes to land use, traffic and circulation, visual resources and neighborhood character. Could affect historic resources.	<ul style="list-style-type: none"> <li>• Land use</li> <li>• Air quality</li> <li>• GHGs</li> <li>• Noise</li> <li>• Hydrology and Water Quality</li> <li>• Traffic and Circulation</li> <li>• Visual Resources and Neighborhood Character</li> <li>• Historical and Cultural Resources</li> </ul>
<b>Strategy 4: Zero Waste</b>			
Action 4.1 Divert Solid Waste and Capture Landfill Emissions	75 percent diversion by 2020 and 90 percent by 2035	Increasing waste diversion may require the construction of new or expansion of existing waste processing facilities, as well as new or expanded waste collection programs. May result in short-term construction impacts and long-term operational impacts, including increased truck traffic, noise, odors, air and GHG emissions.	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• GHGs</li> <li>• Noise</li> <li>• Hydrology and Water Quality</li> <li>• Traffic and Circulation</li> <li>• Visual Resources and Neighborhood Character</li> </ul>
Action 4.2 Capture Methane from Wastewater Treatment	Capture 98 percent wastewater treatment gases by 2035.	New or expanded wastewater treatment facilities, such as anaerobic digesters, may result in short-term construction impacts and long-term impacts such as air emissions, GHGs, noise, traffic and circulation.	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• GHGs</li> <li>• Noise</li> <li>• Hydrology and Water Quality</li> <li>• Traffic and Circulation</li> </ul>
<b>Strategy 5: Climate Resiliency</b>			
Action 5.1 Urban Tree Planting Program	Achieve 15 percent urban canopy cover by 2020 and 35 percent urban canopy cover by 2035	Shade trees planted along streets, in parking lots, and in other public spaces may result in increased demand for irrigation water and City services such as street sweeping. Mature trees may block existing views.	<ul style="list-style-type: none"> <li>• Water supply</li> <li>• <u>GHGs</u></li> <li>• Visual Resources and Neighborhood Character</li> <li>• Utilities and Service Systems</li> </ul>

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