



## 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)

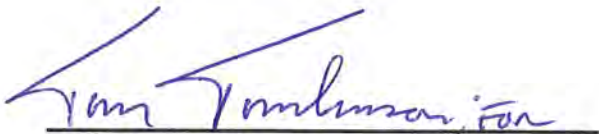
Under CEQA Guideline Section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is environmentally superior. The PEIR identified the ~~proposed CAP~~ CMAP as the environmentally superior alternative because ~~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**

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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="241 683 898 795" 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 1075" 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 1089 310 1110" data-label="Text"> <p>Sincerely,</p> </div> <div data-bbox="256 1089 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 1269" 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.

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@sandiego.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 Cityowned 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.*



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**  
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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 CO2e to Action item 2.1. This is nearly three-quarters of the Total Reductions from Local Actions of 3,531,399 MT CO2e. 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  
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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  
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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.

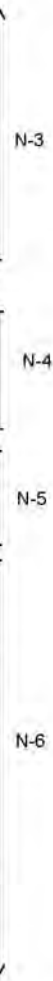
**Comments/Recommendations:**

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.

↑  
N-21

**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@sanidiego.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

<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)

R-1

**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.

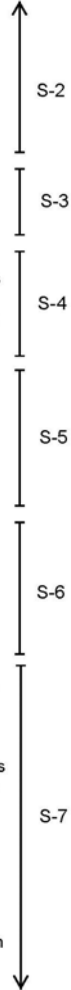
3. Many highly energy efficient products and technologies are already available and ready for deployment. The City should regularly examine its regulatory and incentive programs to determine whether there are cost-effective opportunities to encourage adoption and speed deployment of approaches and technologies 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  
[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

U-1

U-2

**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

U-2

U-3

U-4

U-5

U-6

**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

U-6

U-7

U-8

U-9

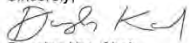
U-10

U-11

U-12

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**

City of San Diego EESTF  
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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

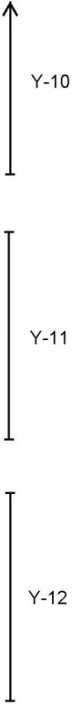
We support the City in having a special focus on ensuring disadvantaged communities benefit from this plan and are prepared to adapt to climate change. We support the goal in Chapter 4, Social Equity and Job Creation, to "Prioritize programs and actions to reduce emissions in disadvantaged communities 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



**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

**TREASURER / SECRETARY**  
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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)*



**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  
City of San Diego Planning Department  
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.

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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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**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.

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- ✓ **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

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.

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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.



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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. Olivenham 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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**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

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<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.

<sup>7</sup> <http://blog.enterprisecommunity.com/2012/05/field-notesequitable-transit-oriented-development>

<sup>8</sup> Sandoval, Gerardo and Roanel Herrera, April 2015.

<sup>9</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

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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

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-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.

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- ✓ 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:
- 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>
  - 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>)
  - 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>
  - 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>

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**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@sandiego.gov](mailto:DSDEAS@sandiego.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.



## 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.

<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/>

**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/eqaa/Soitec-Documents/Final-EIR-Files/Appendix\\_3.1.7-1\\_Emergency%20Service%20Capabilities%20Assessment.pdf](http://www.sandiegocounty.gov/content/dam/sdc/pds/eqaa/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+ons+Via+Via+Esprillo-sells#.VfjaFBwh8s](http://www.sdt.com/news/article.cfm?SourceCode=20150910rde&_t=Rancho+Bernardo-industrial-building+ons+Via+Via+Esprillo-sells#.VfjaFBwh8s)  
<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/>  
 6 Boulevard Planning Group CAP PDEIR comments 9-29-15

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/ica.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**

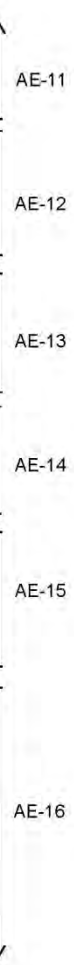
- While power lines in the City of San Diego are being undergrounded to enhance aesthetics and safety<sup>22</sup>, Boulevard and other rural communities have already been impacted, and will continue to be impacted, by large-scale regional electrical utility projects meant to serve the mostly urban customers 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.



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- 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>

**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.

AE-16

AE-17

AE-18

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- 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).  
<http://www.epa.gov/airquality/particlepollution/health.html>

• 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.

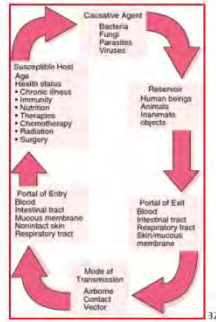


**Response to Comment AE-19**

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

<sup>30</sup> <http://www.epa.gov/airquality/particlepollution/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)



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)

↑  
AF-9

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.

↑  
AF-10

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 Gonzalez*  
Marco A. Gonzalez

*L B Borak*  
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.

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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."

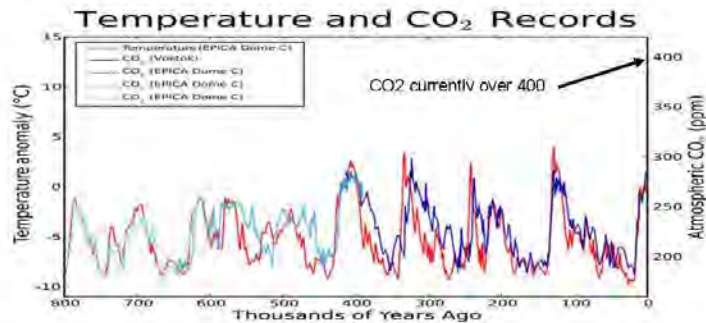
It has also been written<sup>5</sup> that, "Lags in the replacement of fossil-fuel use by clean energy use have put the world on a pace for 6 degree Celsius by the end of this century. Such a large temperature rise occurred 250 million years ago and extinguished 90 percent of the life on Earth. The current 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.

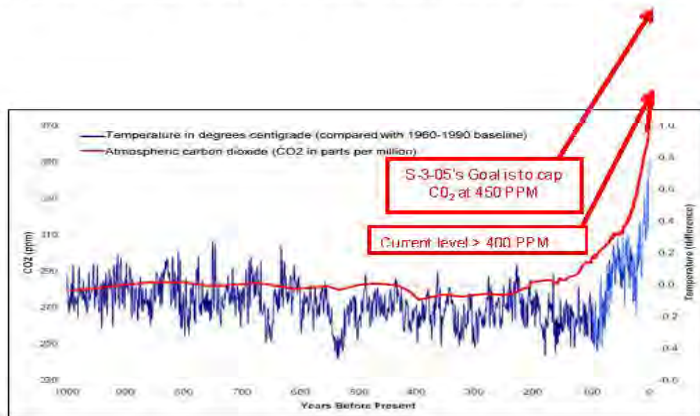
Comment Letter AG

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



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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)16 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.



**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:

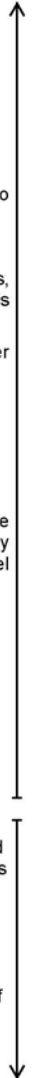
- Adding a *must-drive bonus* to each driver's share of the *parking-lot earnings*, if it happened that their share of the *parking-lot earnings* is less than their parking-lot charge. This means that the employee's *must-drive bonus* would be equal to their *parking-lot charge* minus their share of 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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San Diego, CA 92101  
[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>vii</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

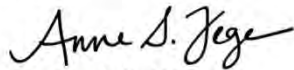
Letter from CFAB about PEIR for Climate Action Plan (CAP), September 29, 2015, page 6

- 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  
[afege@aol.com](mailto:afege@aol.com), 858-472-1293

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  
Tel: 619-544-9256  
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.

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**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



*Creating excellent mobility choices and vibrant, healthy communities.*

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
E. Historical Resources (cont.)		
<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
E. Historical Resources (cont.)		
<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.

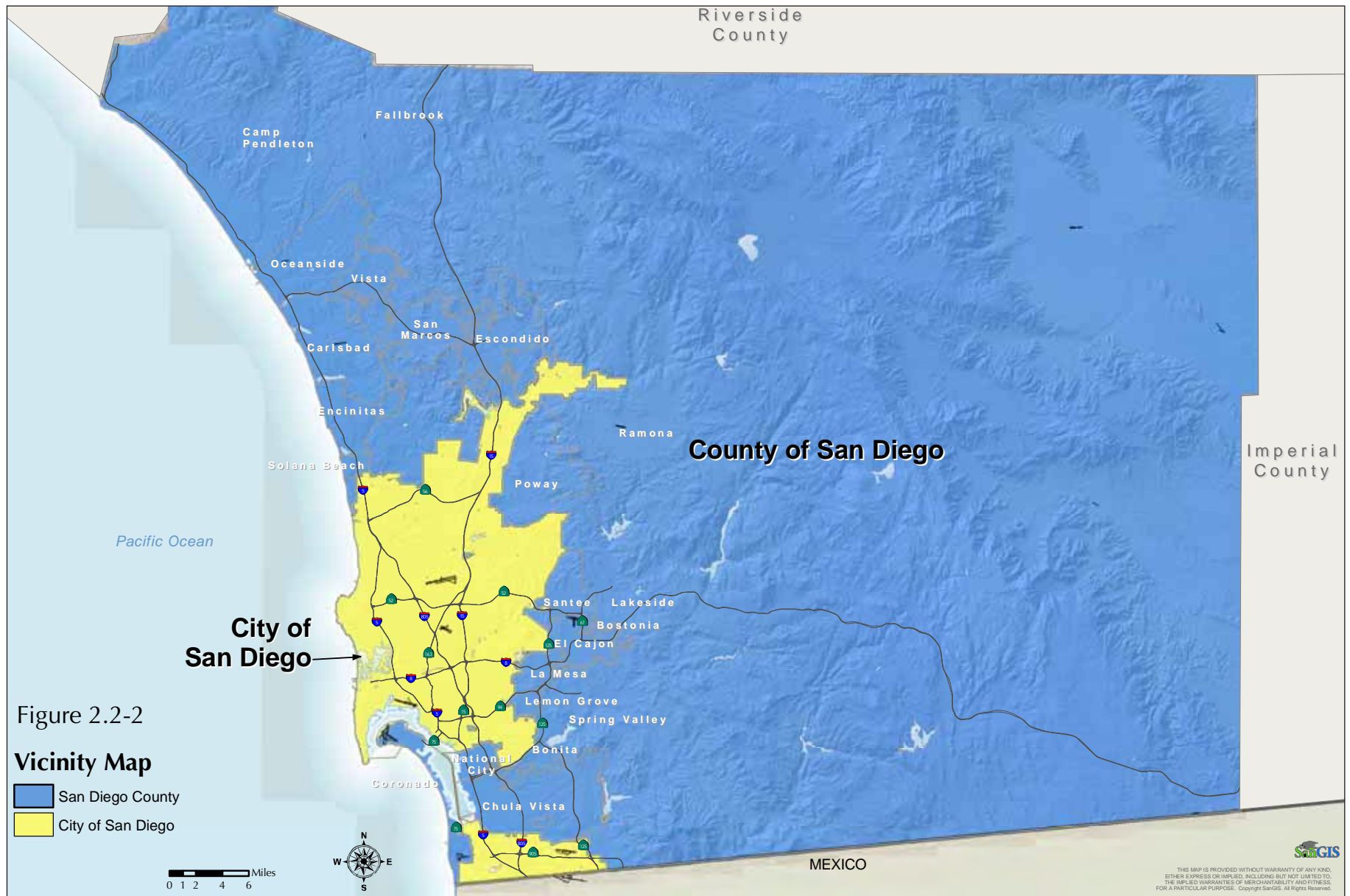
**Mitigation, Monitoring, and Reporting Program** (Chapter 11) describes the procedures, actions, schedule, and responsibility for implementing the mitigation measures in the PEIR.

**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>(4,275,421)</u>	<u>(8,032,274)</u>	<u>(10,044,459)</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.

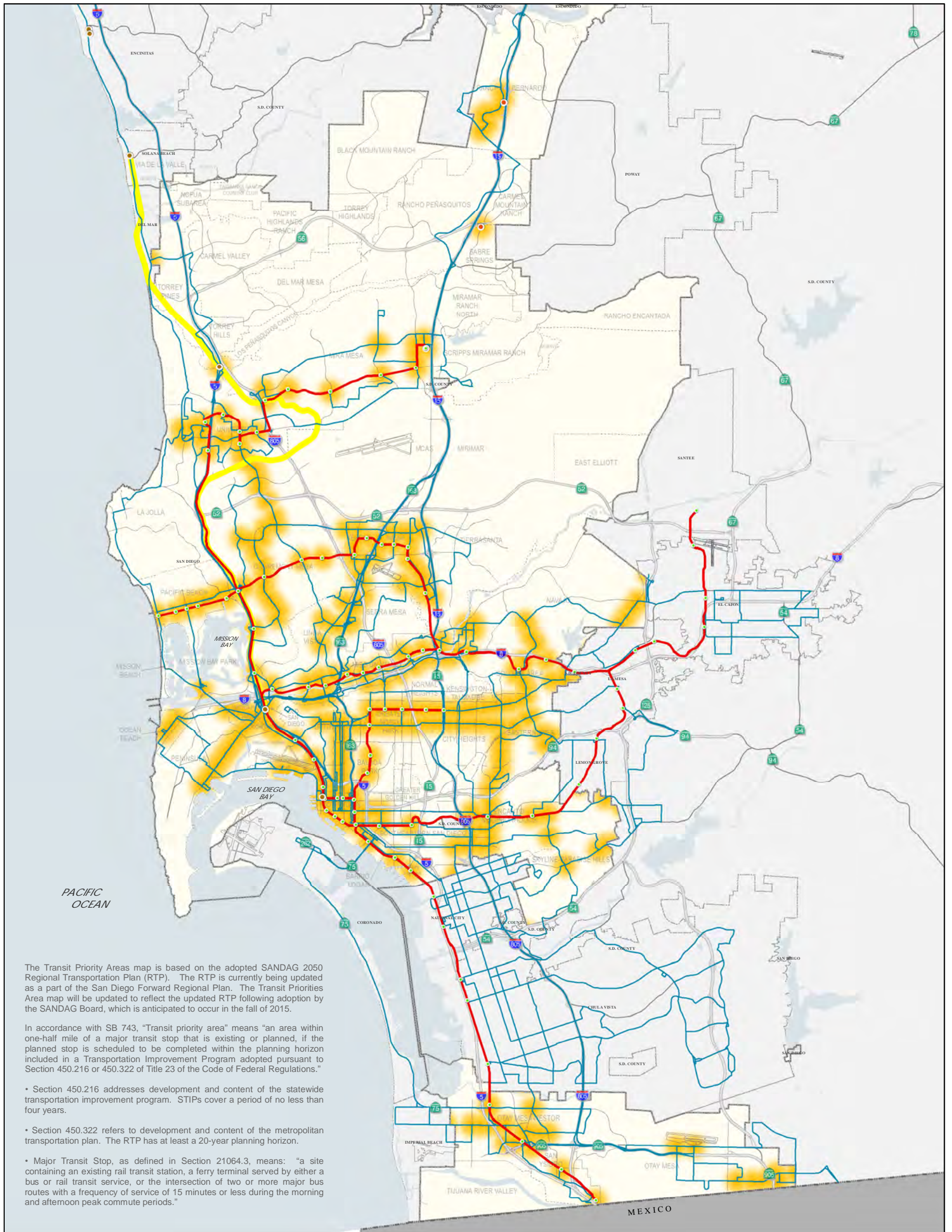
The target for Action 1.2 is to reduce energy consumption at municipal facilities by 15 percent by 2020 and an additional 25 percent by 2035.

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.

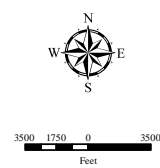
Water rate structures can be used to influence customer's water use behavior and encourage the installation of water efficiency improvements to reduce water bill costs. Such improvements could include replacing toilets, showers, and faucet fixtures; installing efficient irrigation systems; installing 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><u>41,334</u></b>	<b><u>9.8</u></b>	<b><u>53,650</u></b>	<b><u>2.6</u></b>	<b><u>47,019</u></b>	<b><u>4.3</u></b>
	<b><u>41,615</u></b>	<b><u>9.9</u></b>	<b><u>55,133</u></b>	<b><u>4.4</u></b>	<b><u>49,016</u></b>	<b><u>1.9</u></b>
1.1 Residential Energy Conservation, and Disclosure and Benchmarking Ordinance	<del>3,195</del> <u>3,218</u>	0.8	<del>5,840</del> <u>6,078</u>	<del>0.3</del> <u>0.5</u>	<del>5,374</del> <u>5,605</u>	0.2
1.2 City of San Diego's Municipal Energy Strategy and Implementation Plan	<del>11,457</del> <u>11,580</u>	2.7	<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>	2.9	<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>	3.0	<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>	0.5	<del>1,770</del> <u>1,888</u>	0.1	<del>486</del> <u>653</u>	0.0
<b>Strategy 2: Clean &amp; Renewable Energy</b>		<b><del>3.4</del> <u>3.3</u></b>	<b><del>1,314,955</del> <u>558,376</u></b>	<b><del>63.8</del> <u>44.3</u></b>	<b><del>2,635,947</del> <u>1,624,881</u></b>	<b><del>74.6</del> <u>64.4</u></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>	18,621	<del>0.9</del> <u>1.5</u>	21,859	<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><del>152,407</del> <u>152,537</u></b>	<b><del>36.1</del> <u>36.1</u></b>	<b><del>308,556</del> <u>264,130</u></b>	<b><del>15.0</del> <u>20.9</u></b>	<b><del>383,197</del> <u>385,891</u></b>	<b><del>40.9</del> <u>15.3</u></b>
3.1 Mass Transit	<del>119,132</del> <u>119,234</u>	28.2	<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>	0.3	<del>1,334</del> <u>1,338</u>	0.1	<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>	4.5	<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>	2.6	<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>	0.5	<del>2,503</del> <u>2,506</u>	<del>0.4</del> <u>0.2</u>	<del>2,154</del> <u>2,172</u>	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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## **CHAPTER 3**

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# Environmental Setting, Impacts, and Mitigation Measures

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## A. Land Use

### A.1 Introduction

This section of the PEIR analyzes the potential environmental effects on land use/planning from implementation of the City of San Diego (City) Climate Action Plan (CAP).

### A.2 Environmental Setting

#### Regional Land Use Patterns

The City of San Diego is the largest incorporated city in San Diego County and borders unincorporated areas of the County, a number of other cities and the U.S.-Mexico border. The County of San Diego identifies 23 community and subregional areas throughout the County. The City of San Diego serves as the primary employment center for the region, with many residents of surrounding cities commuting to areas within San Diego.

San Diego's southern most communities lie along the U.S.-Mexico border near the San Diego-Baja California point-of-entry, which is considered one of the busiest in North America. On the other side of the border is the City of Tijuana, the largest city in the Mexican state of Baja California. The Otay sub-region is located east of the City of San Diego's Otay Mesa community planning area and the City of Chula Vista near the U.S.-Mexico border. East Otay Mesa, one of two specific plan areas within the Otay sub-region, is a relatively flat mesa with mountains at the eastern edge and a major river valley and tributary canyon to the north. The predominant land uses in this area are industrial land uses, including distribution and warehouse uses.

North of the City of San Diego are the cities of Escondido and Poway, which include predominantly large-lot single-family residences and regional commercial, industrial, and office complexes. The County's San Dieguito Community Plan area is also located to the north and consists primarily of low-density estate residential uses. The City of San Diego is bordered to the northwest by the City of Del Mar and the City of Solana Beach. Del Mar and Solana Beach are coastal cities, which include older community cores located close to the beach surrounded by lower density residential development. In addition, the City of Coronado lies west of San Diego Bay. The San Diego-Coronado Bay Bridge, a two-mile long area landmark, connects the island of Coronado to the City of San Diego.

The City of Chula Vista is the second largest city in the County and is located in southern San Diego County, between National City and the southernmost portion of the City of San Diego. East of San Diego are the cities of Santee, El Cajon, La Mesa and Lemon Grove, which consist of older urban cores and well-established residential areas. The County's unincorporated community of Lakeside is also located to the east and includes primarily residential uses with a rural/suburban character. Two non-contiguous county islands exist within the City of San Diego. The Mira Mesa Island (Davis Ranch) is approximately 77 acres located within the Scripps Miramar Ranch

Community Plan area. Greenwood Island (Mount Hope Cemetery) is approximately 100 acres located in the Southeastern Community Plan area.

## Existing Land Uses

The existing land uses within the City are described in Chapter 3.8, Land Use, of the Final Environmental Impact Report for the City's 2008 General Plan Update (General Plan PEIR). Additionally, relevant goals and policies are summarized in Chapter 3 of the General Plan PEIR. The detailed setting and policies provided in the General Plan PEIR are fully incorporated by these references.

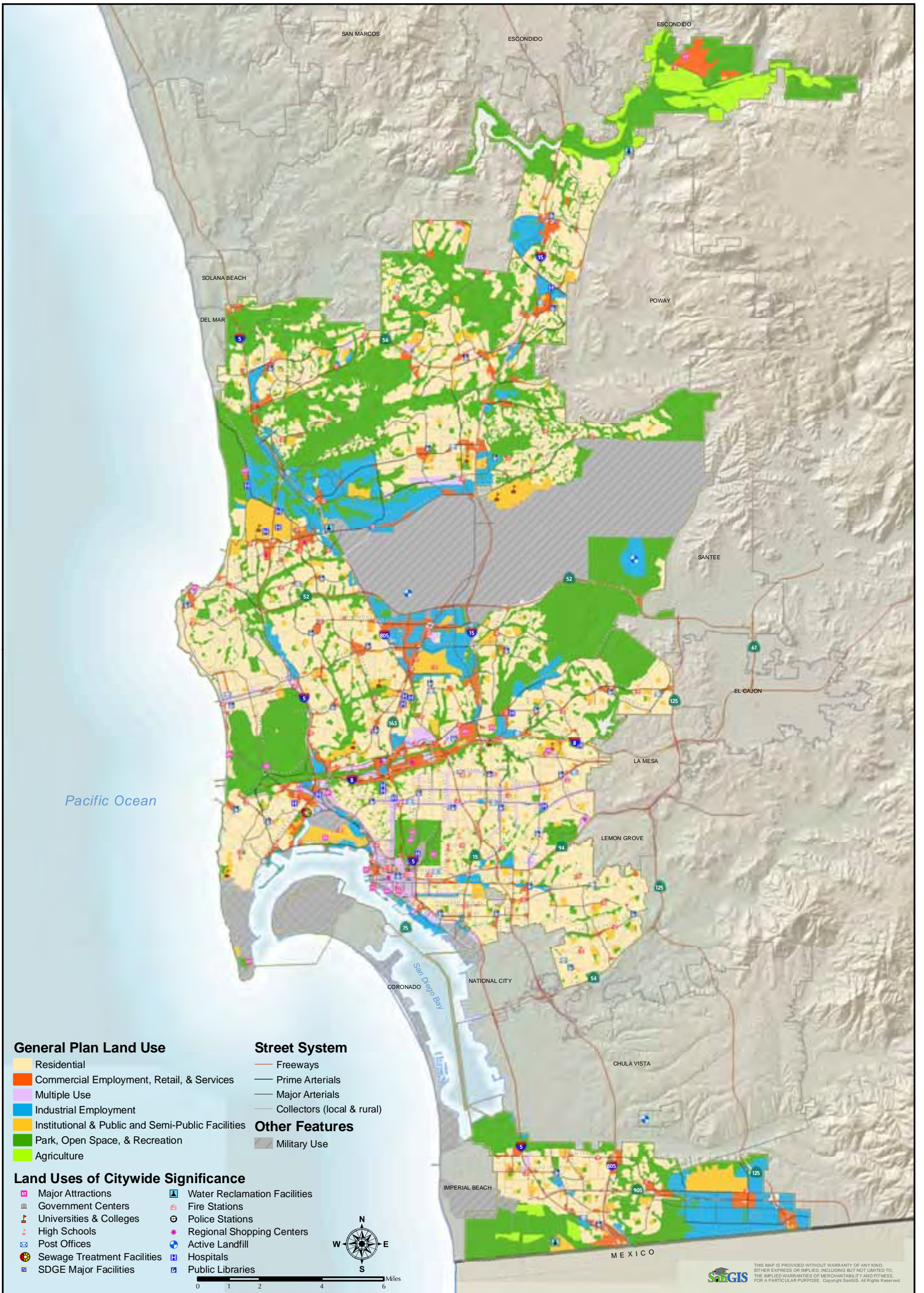
A summary of existing and planned land uses within the City are shown below in **Table 3.A-1** and in **Figure 3.A-1**. Much of the existing land use in the City is dedicated to Parks, Open Space, and Recreation as well as Residential land uses of varying densities, which combined amount to around 50 percent of the total land uses in the City. Institutional, Public and Semi-Public uses account for nearly 17 percent of the City's land use, and transportation related facilities account for 14 percent. Industrial Employment and Commercial Employment, Retail and Service uses account for a relatively small portion of land uses at four percent and 3.6 percent, respectively. Less than three percent of land is dedicated to Agriculture, and Vacant land accounts for 3.6 percent of the land area.

Under the City of San Diego General Plan (2008), all of the vacant land in the City would be developed. Agricultural, Commercial Employment, Retail, and Service uses and Institutional Public and Semi-Public Facilities would decrease in acreage. Much of this land would be converted to Multiple Use, Industrial Employment, Residential, and Park, Open Space, and Recreation uses.

**TABLE 3.A-1  
EXISTING AND PLANNED LAND USE**

Land Use	Existing (2008)		Planned (2035)		Land Use Changes	
	Acres	Percent	Acres	Percent	Acres	Percent
Agriculture	6,055	2.8	3,670	1.7	(2,385)	-39.4
Commercial Employment, Retail, and Services	7,887	3.6	6,114	2.8	(1,773)	-22.5
Industrial Employment	8,928	4.1	12,278	5.6	3,350	37.5
Institutional, Public and Semi-Public Facilities	37,103	16.9	36,545	16.7	(558)	-1.5
Multiple Use	-	-	4,534	2.1	4,534	2.1
Park, Open Space, and Recreation	60,654	27.7	62,686	28.6	2,032	3.4
Residential	52,389	23.9	55,987	25.5	3,598	6.9
Roads/Freeways/Transportation Facilities	31,291	14.3	30,495	13.9	(796)	-2.5
Water Bodies	6,932	3.2	6,932	3.2	-	0.0
Vacant	8,002	3.6	-	-	(8,002)	-100.0
<b>Total</b>	<b>219,241</b>	<b>100.0</b>	<b>219,241</b>	<b>100.0</b>	<b>-</b>	<b>NA</b>

SOURCE: General Plan Final PEIR, 2007.



SOURCE: City of San Diego Draft General Plan Final PEIR, September 2007

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**Figure 3.A-1**  
 General Plan Land Use



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## A.3 Regulatory Setting

### Federal

#### ***Federal Aviation Administration (FAA)***

The authority of the Federal Aviation Administration (FAA) over proposed projects is defined in the Code of Federal Regulations Title 14 Chapter 1 Subchapter E Part 77 – Safe, Efficient Use, and Preservation of the Navigable Airspace (49 CFR Part 77). Any project that is proposed within or near an airport, as described in §77.9 Construction or Alteration Requiring Notice, is required to coordinate with the FAA to ensure the construction and operation of the proposed project is consistent with all FAA requirements.

### State

#### ***Sustainable Communities and Climate Protection Act of 2008***

Senate Bill (SB) 375 was enacted in 2008 and is formally referred to as “The Sustainable Communities and Climate Protection Act of 2008.” SB 375 relates to regional land use and transportation policies, with an emphasis on policies to reduce statewide GHG emissions. The law requires the State’s 18 metropolitan planning organizations to adopt sustainable community strategies that, if implemented, would help each region achieve their respective targets for reducing GHG emissions from automobiles and light trucks. The targets are established by the California Air Resources Board. SANDAG, San Diego’s metropolitan planning organization, adopted an updated Regional Transportation Plan and Sustainable Communities Strategy in October 2011 to address the requirements of SB 375.

#### ***Executive Order S-13-08***

On November 14, 2008, Governor Schwarzenegger issued Executive Order S-13-08, the Climate Adaptation and Sea Level Rise Planning Directive, which provides clear direction for how the State should plan for future climate impacts. Executive Order S-13-08 calls for the implementation of four key actions to reduce the vulnerability of California to climate change:

- Initiate California’s first statewide Climate Change Adaptation Strategy (CAS) that will assess the state’s expected climate change impacts, identify where California is most vulnerable, and recommend climate adaptation policies
- Request that the National Academy of Sciences establish an expert panel to report on sea level rise impacts in California in order to inform State planning and development efforts
- Issue interim guidance to State agencies for how to plan for sea level rise in designated coastal and floodplain areas for new and existing projects
- Initiate studies on critical infrastructure and land-use policies vulnerable to sea level rise.

The 2009 CAS report summarizes the best known science on climate change impacts in the state to assess vulnerability, and outlines possible solutions that can be implemented within and across State agencies to promote resiliency. This is the first step in an ongoing, evolving process to reduce California's vulnerability to climate impacts (CNRA 2009).

### ***California Code of Regulations (CCR) Title 24, Part 6***

Title 24 CCR, Part 6 (California's Energy Efficiency Standards for Residential and Nonresidential Buildings) (Title 24) were first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods. Although it was not originally intended to reduce greenhouse gas (GHG) emissions, electricity production by fossil fuels results in GHG emissions and energy efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions. The most recent updates to Title 24 became effective on July 1, 2013.

### ***California Coastal Act***

The California Coastal Commission was established by voter initiative in 1972 (Proposition 20) and later made permanent by the Legislature through adoption of the California Coastal Act of 1976. The Coastal Commission, in partnership with coastal cities and counties, plans and regulates the use of land and water in the coastal zone. Development activities, which are broadly defined by the Coastal Act to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the Coastal Commission or the local government.

The Coastal Act includes specific policies (see Division 20 of the Public Resources Code) that address issues such as shoreline public access and recreation, lower cost visitor accommodations, terrestrial and marine habitat protection, visual resources, landform alteration, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, and public works. The policies of the Coastal Act constitute the statutory standards applied to planning and regulatory decisions made by the Commission and by local governments, pursuant to the Coastal Act.

### ***Local Coastal Program***

The City's Community Plans located within the State Coastal Zone Boundary must be certified by the California Coastal Commission (Coastal Commission) as being appropriate to implement the Coastal Act. The City of San Diego has the authority to issue Coastal Development Permits for areas of the Coastal Zone where the Coastal Commission has certified the Local Coastal Program (LCP). Other designations include appealable and nonappealable areas, in which a Coastal Development Permit may or may not be appealed to the Coastal Commission. In addition, there are deferred certification areas in which the Coastal Commission has not certified the City's land use plan and areas that are solely under the jurisdiction of the Coastal Commission, called areas of original jurisdiction.

The Coastal Zone Boundary encompasses much of the land west of Interstate 5 (I-5), as well as some land near State Route 56 (SR 56) to the north, and includes portions of the following communities: Barrio Logan, Carmel Valley, Del Mar Mesa, Downtown, La Jolla, Los Penasquitos Canyon, Midway-Pacific Highway, Mira Mesa, Mission Bay Park, Mission Beach, Ocean Beach, Pacific Beach, Peninsula, Torrey Hills, Tijuana River Valley, Torrey Pines, University, and Via De La Valle.

## **Regional**

### ***San Diego Association of Governments (SANDAG)***

SANDAG is the region's metropolitan planning organization (MPO) and serves as a forum for public decision making on regional issues such as growth, transportation, and land use in the San Diego region and is comprised of representatives from each of San Diego County's local jurisdictions, including the City of San Diego. SANDAG programs such as the Regional Comprehensive Plan (RCP) and Regional Transportation Plan (RTP) are pertinent to the City of San Diego's General Plan efforts.

### ***Regional Comprehensive Plan (RCP)***

The RCP is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The City of San Diego's General Plan is intended to complement this plan and encourage smart growth principles. Goals of the RCP are to establish a planning framework and implementation actions that increase the region's sustainability and encourage smart growth. The plan seeks to achieve sustainability through planning and development that meets economic, environmental, and community needs, without jeopardizing the ability of future generations to meet these needs. The RCP contains an incentive-based approach to encourage and channel growth into existing and future urban areas and smart growth communities. In May of 2012, the SANDAG board of directors voted to integrate the RCP with the development of the next RTP/SCS, with a target adoption date of July 2015.

### ***SANDAG 2050 Regional Transportation Plan and Sustainable Communities Strategy***

The 2050 Regional Transportation Plan/Sustainable Communities Strategy (2050 RTP/SCS), adopted by SANDAG in 2011, presents a transportation system designed to maximize transit enhancements, integrate biking and walking elements, and promote programs to reduce demand and increase efficiency (SANDAG 2011). One key theme of the RTP is to improve the connections between land use and transportation plans by using smart growth principles. The 2050 RTP includes a Sustainable Communities Strategy (SCS) that integrates land use planning, housing development, and transportation planning. The SCS also addresses how the transportation system is developed in such a way that the region reduces per-capita GHG emissions to State-mandated levels. The SCS includes a land use pattern that accommodates the region's future employment and housing needs, and protects sensitive habitats and resource areas. To accomplish this in a sustainable manner, the 2050 RTP/SCS land use pattern focuses housing and jobs growth in existing urbanized areas, protects about 1.3 million acres of land, and invests

in a transportation network that provides residents and workers with alternatives to driving alone. New development would be more compact and more accessible to public transit and other travel choices, such as walking and bicycling.

## **Local**

### ***San Diego General Plan***

The City's General Plan, updated in 2008, sets out a long-range vision and comprehensive policy framework for how the City should grow and develop, provide public services, and maintain the qualities that define San Diego over the next 20 to 30 years. It provides a strategy, the City of Villages, for how the City can enhance its many communities and neighborhoods as growth occurs over time. The City of Villages strategy focuses growth into mixed use activity centers that are pedestrian-friendly districts linked to an improved regional transit system. The strategy draws upon the character and strengths of San Diego's natural environment, neighborhoods, commercial centers, institutions, and employment centers. The strategy is designed to sustain the long-term economic, environmental, and social health of the City and its many communities. It recognizes the value of San Diego's distinctive neighborhoods and open spaces that together form the City as a whole.

A "village" is defined as the mixed-use heart of a community where residential, commercial, employment, and civic uses are all present and integrated. Each village will be unique to the community in which it is located. All villages will be pedestrian-friendly and characterized by inviting, accessible and attractive streets and public spaces. Public spaces will vary from village to village, consisting of well-designed public parks or plazas that bring people together. Individual villages will offer a variety of housing types affordable for people with different incomes and needs. Over time, villages will connect to each other via an expanded regional transit system.

### **Community Plans, Precise Plans, and Specific Plans**

The City has 55 distinct community plan areas. The community plan areas fall within seven community typologies which describe predominant architectural features and urban planning characteristics. The seven typologies include: Coastal, Downtown, Military/Environmental/Other Limited Development, Pre-World War II (Pre 1945), Post-World War II Suburban (1945-1970), Newer Urban 1960 to Present, and Master Planned Suburban (1970-Present). Each community planning area has its own land use plan that specifically addresses land use distribution and land use designations in more detail than is possible at the General Plan level. Community plans also provide policy for community facilities, urban design and other aspects of community planning as needed. The City is in the process of updating community plans to reflect the policy changes of the General Plan.

Within the community plan framework, precise plans and specific plans detail land use, public facility, and design issues on a smaller scale than community plans, which represent a broader policy scope. While precise plans are typically policy documents focused on a portion of a community plan area, specific plans can be a policy document or a combined policy and

regulatory document that is reflected in the Land Development Code (LDC) through implementation of LDC zones.

### Relevant General Plan Policies

The following General Plan policies from the Land Use Element and Urban Design Element address GHG emissions and climate change:

- LU-A.1 Designate a hierarchy of village sites for citywide implementation.
- b. Encourage further intensification of employment uses throughout Subregional Employment Districts. Where Appropriate, consider collocating medium-to high-density residential uses with employment uses (see also Economic Prosperity Element).
  - d. Revitalize transit corridors through the application of plan designations and zoning that permits a higher intensity of mixed-use development, employment uses, commercial uses, and higher density-residential development.
- LU-A.2 Identify sites suitable for mixed-use village development that will complement existing community fabric or help achieve desired community character, with input from recognized community planning groups and the general public.
- LU-A.3 Identify and evaluate potential village sites considering the following physical characteristics:
- Shopping centers, districts, or corridors that could be enhanced or expanded;
  - Community or mixed-use centers that may have adjacent existing or planned residential neighborhoods;
  - Vacant or underutilized sites that are outside of open space or community-plan designated single-family residential areas;
  - Areas that have significant remaining development capacity based upon the adopted community plan; and
  - Areas that are not subject to major development limitations due to topographic, environmental, or other physical constraints.
- LU-A.4 Locate village sites where they can be served by existing or planned public facilities and services, including transit services.
- LU-A.5 Conduct environmental review and focused study during the community plan update process, of potential village locations, with input from recognized community planning groups and the general public, to determine if these locations are appropriate for mixed-use development and village design.
- LU-A.7 Determine the appropriate mix and densities, intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan.
- b. Achieve transit-supportive density and design, where such density can be adequately served by public facilities and services (see also Mobility Element, Policy ME-B.9). Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community.

- c. Evaluate the quality of existing and planned transit service.
- LU-A.8 Determine at the community plan level where commercial uses should be intensified within villages and other areas served by transit, and where commercial uses should be limited or converted to other uses.
- LU-A.10 Design infill projects along transit corridors to enhance or maintain a “Main Street” character through attention to site and building design, land use mix, housing opportunities, and streetscape improvements.
- LU-H.6 Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.
- LU-I.11 Implement the City of Villages concept for mixed-use, transit-oriented development as a way to minimize the need to drive by increasing opportunities for individuals to live near where they work, offering a convenient mix of local goods and services, and providing access to high quality transit services.
- UD-A.1 Preserve and protect natural landforms and features.
- a. Protect the integrity of community plan designated open spaces (see also Conservation Element, Policy CE-B.1).
  - b. Continue to implement the Multiple Species Conservation Program (MSCP) to conserve San Diego’s natural environment and create a linked open space system. Preserve and enhance remaining naturally occurring features such as wetlands, riparian zones, canyons, and ridge lines.
- UD-A.10 Design or retrofit streets to improve walkability, bicycling, and transit integration; to strengthen connectivity; and to enhance community identity. Streets are an important aspect of Urban Design as referenced in the Mobility Element (see also Mobility Element, Sections A, B, C, and F).
- UD-B.5d Emphasize the provision of high quality pedestrian and bikeway connections to transit stops/stations, village centers, and local schools.
- UD-C.1 In villages and transit corridors identified in community plans, provide a mix of uses that create vibrant, active places in villages.
- a. Encourage both vertical (stacked) and horizontal (side-by-side) mixed-use development.
  - b. Achieve a mix of housing types, by pursuing innovative designs to meet the needs of a broad range of households.

### **Open Space and Landform Preservation**

- CE-B.1 Protect and conserve the landforms, canyon lands, and open spaces that: define the City’s urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.
- a. Utilize Environmental Growth Funds and pursue additional funding for the acquisition and management of MHPA and other important community open space lands. Support the preservation of rural lands and open spaces throughout the region.

- c. Protect urban canyons and other important community open spaces including those that have been designated in community plans for the many benefits they offer locally, and regionally as part of a collective citywide open space system (see also Recreation Element, Sections C and F; Urban Design Element, Section A).
  - d. Minimize or avoid impacts to canyons and other environmentally sensitive lands, by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirecting of sewage discharge away from canyons and other environmentally sensitive lands.
  - e. Encourage the removal of invasive plant species and the planting of native plants near open space preserves.
  - f. Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological resource areas of the City's adopted MSCP Subarea Plan.
  - g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation.
- CE-B.2 Apply the appropriate zoning and Environmentally Sensitive Lands (ESL) regulations to limit development of floodplains, sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands.
- a. Manage watersheds and regulate floodplains to reduce disruption of natural systems, including the flow of sand to the beaches. Where possible and practical, restore water filtration, flood and erosion control, biodiversity and sand replenishment benefits.
  - b. limit grading and alterations of steep hillsides, cliffs and shoreline to prevent increased erosion and landform impacts.

### ***Land Development Code***

The City's Land Development Code (LDC) is found in Chapters 11-14 of the Municipal Code, and contains the City's planning, zoning, subdivision, and building regulations. Overlay zones are applied in conjunction with base zones to address certain issue areas. Three of the most important overlay zones are: the Community Plan Implementation Overlay Zone, the Airport Approach Overlay Zone, and the Airport Environs Overlay Zone. Overlay zones that correspond with the coastal zone include the Coastal Overlay Zone, Coastal Height Limit Overlay Zone, and the Sensitive Coastal Overlay Zone. The Land Development Code also contains the Environmentally Sensitive Lands (ESL) regulations and related Biology Guidelines, which establish regulations and guidance for development within environmentally sensitive lands.

The City also utilizes Planned District Ordinances which consist of 20 separate zoning codes that address land use and design that aim to protect unique community features. The LDC further contains general development regulations. The City's ESL regulations (ESLs) are intended to protect, preserve, and restore lands containing steep hillsides, sensitive biological resources, coastal beaches, sensitive coastal bluffs, or Special Flood Hazard Areas.



## ***Natural Resource Plans***

### **Parks and Open Space Plans**

In addition to the General Plan and community plans, which contain guidelines for growth, development and land use, there are park master plans and natural resource management plans for special areas of the City, which contain environmental goals, policies, and recommendations for park and open space areas. Natural resource management plans are required as a condition of the implementing agreement with the wildlife agencies for the Multiple Species Conservation Program (MSCP), and contain area-specific management directives to address management issues at the site-specific level. Plans include:

- Balboa Park Master Plan (Adopted 1989 and Amended 1997), Balboa Park East Mesa Precise Plan (Adopted 1993), and Balboa Park Inspiration Point Precise Plan (Draft 1998), Balboa Park Central Mesa Appendix (1992)
- Mission Bay Park Master Plan Update and Design Guidelines (Adopted 1994 and Amended 2002) Mission Bay Natural Resource Management Plan (1990)
- Otay Valley Regional Park Concept Plan (Adopted 2001)
- San Diego River Park Master Plan (Adopted 2013)
- Sunset Cliffs Natural Park Master Plan (Adopted 2005)
- Famosa Slough Enhancement Plan (1993)
- First San Diego River Improvement Project Specific Plan (Adopted 1984)
- First San Diego River Natural Resource Management Plan (Adopted 2004)
- Los Peñasquitos Enhancement Plan and Program (October 1985), Los Peñasquitos Canyon Preserve Master Plan (Adopted 1998), and Los Peñasquitos Canyon Preserve Natural Resource Management Plan (Adopted 1998)
- Marian Bear Memorial Park Natural Resource Management Plan (Adopted 1994)
- San Dieguito River Regional Park (Adopted 1984) and San Dieguito River Park Concept Plan (1994)
- Tecolote Canyon Natural Park Master Plan (1982)
- Chollas Creek Enhancement Program (Adopted 2002)
- Mission Trails Regional Park Master Plan (Adopted 1985), Mission Trails Regional Park Plan Update and Design Guidelines (Adopted 1994 and Amended 2002)
- Torrey Pines City Park General Development Plan (2012)
- Black Mountain Open Space Park Natural Resource Management Plan (Adopted 2014)
- Tijuana River National Estuarine Research Reserve Comprehensive Management Plan (2010)

### **Regional Natural Community Conservation Planning (NCCP)**

Jurisdictions within San Diego County have developed several multiple jurisdiction natural habitat planning and open space conservation programs in accordance with the California Department of Fish and Wildlife (CDFW) Natural Community Conservation Planning (NCCP) program. The NCCP program, enacted in 1991, was established to provide long-term, regional protection of native vegetation and wildlife diversity while allowing compatible land uses and appropriate development and growth.

### **Multiple Species Conservation Program (MSCP)**

The MSCP is a comprehensive habitat conservation planning program for 582,243 acres in southwestern San Diego County. The MSCP is intended to preserve a network of habitat and open space to protect biodiversity and enhance the region's quality of life. Economic benefits of the MSCP include reducing constraints on future development and decreasing the costs of compliance with federal and State natural resource laws. The City of San Diego is one of 11 jurisdictions within the MSCP study area. The City has adopted a Subarea Plan and implementing agreement with the United States Fish and Wildlife Service (USFWS) and CDFW.

### **San Diego Multiple Species Subarea Plan and Biological Resource Guidelines (2012)**

The City of San Diego MSCP Subarea Plan (City of San Diego 1997) has been prepared pursuant to the overall MSCP guidelines to address habitat conservation goals within the City boundaries. The City's Multi-Habitat Planning Area (MHPA) is approximately 56,831 acres with 52,727 acres of core biological resource areas and corridors targeted for conservation. As of December, 2015, a total of 49,965.74 acres (94.4 percent) has been conserved or obligated towards the planned 52,727-acre goal. **Figure 3.A-2** shows the MHPA.

Approximately 15,341 acres of the remaining 19,614 acres are obligated as open space in association with public open space referred to as "cornerstone lands" and open space approved as a part of approved private projects that has not yet been placed in a conservation easement or dedicated to the City. The remaining 4,273 acres (8 percent) of open space required to assemble the preserve will be acquired through future private conservation and public acquisition of open space. Within the City of San Diego, preservation efforts are focused on assembling the regional preserve, or MHPA, which includes large, contiguous, biologically significant areas and associated corridors. These areas are found throughout the City, with large, core areas near the northern, eastern and southern jurisdictional boundaries; however, the MHPA also includes north-south and east-west corridors in the heart of the City (e.g., San Diego River) as well as urban canyons.

### ***San Diego International Airport Land Use Compatibility Plan***

The San Diego County Regional Airport Authority (Authority) serves as the Airport Land Use Commission (ALUC) for San Diego County. The ALUC is responsible for adopting Airport Land Use Compatibility Plans (ALUCPs) for sixteen public-use and military airports in San Diego County. The ALUCP establishes areas of influence within which airport operations are likely to affect land uses or land uses could affect airport operations. Safety and noise criteria are identified in the ALUCP so that land use conflicts with airport operations are minimized. Prior to amending a general plan, a local agency must refer the proposed action to the ALUC (Pub. Util.

Code Sec. 21676 et seq.). County and city general plans must be consistent with the ALUCP (Government Code Section 65302.2).

Currently, there are five adopted ALUCPs in place within the City's land use jurisdiction that include the San Diego International Airport, MCAS Miramar, Brown Field Municipal Airport, and Montgomery Field Municipal Airport. Compatibility plans have not been prepared for Naval Air Station North Island or Naval Outlying Field Imperial Beach.

### ***Air Installations Compatible Use Zones (AICUZ) Study***

The federal government requires that the military develop AICUZ studies for military air installations. An AICUZ study establishes land use strategies and noise and safety recommendations to prevent the encroachment of incompatible land use from degrading the operational capability of military air installations. State law requires that the ALUCP be consistent with the AICUZ studies. Once updated plans are published, the Airport Authority, acting as ALUC, addresses the AICUZ study strategies and recommendations as part the ALUCP update for military installations within the county.

## **A.4 Impacts and Mitigation Measures**

### **Significance Criteria**

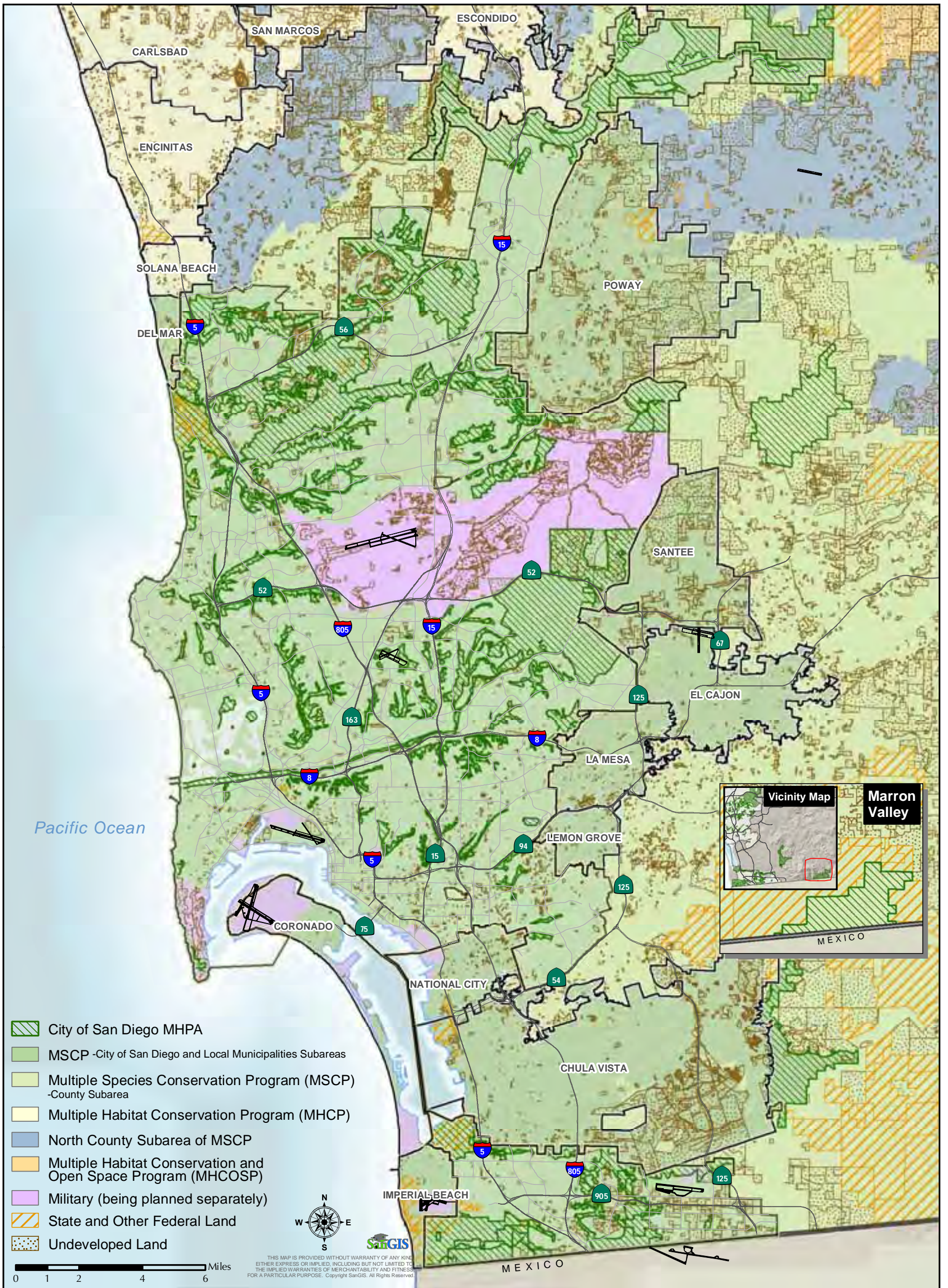
According to the City of San Diego's CEQA Significance Determination Thresholds (January 2011), the following questions provide guidance to determine potential significance for land use:

Would the proposal:

1. Require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?
2. Result in a conflict with the environmental goals, objectives and recommendations of the community plan in which it is located?
3. Conflict with the provisions of the City's Multiple Species Conservation Program Subarea Plan or other approved local, regional or State habitat conservation plan?
4. Physically divide an established community?
5. Result in land uses which are not compatible with an adopted airport Comprehensive Land Use Plan (CLUP)?

The Significance Determination Thresholds go on to state that a significant impact with regard to land use could occur if a project would result in any of the following:

- Inconsistency/conflict with the environmental goals, objectives, or guidelines of a community or general plan;
- Inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur;



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- Substantial incompatibility with an adopted plan;
- Development or conversion of General Plan or Community Plan designated open space or prime farmland to a more intensive land use;
- Incompatible uses as defined in an Airport Land Use Plan or inconsistency with an airport's ACLUP as adopted by the ALUC;
- Inconsistency/conflict with adopted environmental plans for an area; and/or,
- Significantly increase the base flood elevation for upstream properties, or construct in a Special Flood Hazard Area (SFHA) or floodplain/wetland buffer zone.

## Impact Analysis

As indicated in Table 2-5 in Chapter 2, Project Description, the CAP strategies, actions, and supporting measures that could have an impact on land use include:

- **Action 2.1 Community Choice Aggregation Program or Similar Program.** Supporting measures and steps that implement this action could result in land use conflicts or inconsistencies related to the construction of large scale renewable energy generation, transmission, and storage systems.
- **Action 3.1 Implement General Plan Mobility Element and City of Villages Strategy in Transit Priority Areas.** This action would facilitate the implementation of The City of Villages strategy and the shift to greater emphasis on mass transit and other modes of transportation. This action could therefore result in changes to the urban environment that could be inconsistent or conflict with existing land uses and land use plans and policies.

### *Issue 1: Would implementation of the CAP conflict with applicable land use plans, policies or regulations of an agency with jurisdiction over the Project?*

The CAP is a policy-level document that proposes strategies to reduce GHG emissions and is designed to mitigate adverse environmental impacts associated with global climate change. The CAP has been prepared to be consistent with the City's General Plan, other planning documents, and the Development Code. The CAP does not propose any site-specific projects or grant any entitlements for development, but rather proposes a set of strategies, actions, and supporting measures that are intended to add detail to and implement climate-related policies of the General Plan and other plans.

Action 2.1 provides for consideration of a community choice aggregation (CCA) program or other program to achieve a target of 100 percent renewable supply of electricity by 2035. 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 CCA 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. Large scale systems may be developed by the

City, or the City may enter into purchase agreements with owners of such facilities to supply renewable energy.

Small-scale renewable energy systems, such as residential and small commercial roof-top solar photovoltaic (PV), generally result in minimal environmental impacts and are exempt from analysis under CEQA if they are less than 500 square feet, pursuant to SB 226. They would not result in or require a change in land use designation and in general would not result in incompatibility with surrounding land uses. Smaller systems that are located in sensitive areas or where land uses are incompatible, such as in biologically sensitive areas or on or near historic buildings, would be subject to existing Land Development Code restrictions and regulations designed to protect these resources, thereby avoiding a significant land use conflict (see further discussion of potential conflicts with habitat conservation plans, in Issue 3, below).

Potential land use compatibility issues may, however, result from the development of larger renewable energy generation, transmission, and storage systems. Larger renewable energy systems that may be encouraged or facilitated by implementation of the CAP may include, but are not limited to, large-scale solar PV and solar thermal facilities; on- and off-shore wind turbines, tidal and water power systems, geothermal systems, hydropower systems; and biomass systems; as well as new or upgraded transmission lines, substations, and energy storage systems. In general, larger-scale renewable energy facilities would be located in industrial areas, industrial brownfields,<sup>1</sup> and near existing utility infrastructure. This would include areas designated in the General Plan for industrial uses, institutional, public, and semi-public facilities, and military uses. Land use compatibility conflicts would not generally be expected for facilities located in these areas. If a project were proposed on agricultural land, private land near residential uses, or open space, then land use compatibility conflicts could arise. This may occur, for example, with a proposed wind project on private lands on coastal bluffs or ridgelines. A project of this kind may be incompatible with existing land use and zoning designations, and may conflict with adjacent land uses, for example residential and open space uses. This could result in a significant impact.

Outside of the City limits, development of large-scale renewable energy facilities may occur on private or public lands. Such developments could be proposed for locations with General Plan or Zoning Code designations incompatible with facilities of this kind. In such cases, it would be the responsible of the agency with land use authority over the project site to ensure that such developments were compatible with existing designations or zoning, or to consider a variance or changing the designation or zoning to accommodate the project. Therefore, conflicts either would not occur, or would have to be resolved by the local agency. In either case, it is anticipated that conflicts with land use designations be considered in the planning and environmental review process for proposed facilities.

Action 3.1 prioritizes implementing the General Plan City of Villages Strategy in Transit Priority Areas (TPAs) identified in the 2050 San Diego Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The CAP would not change the land use designation of any

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<sup>1</sup> Brownfields refer to land previously used for commercial or industrial purposes that is known to be or believed to be contaminated with hazardous waste or pollution.

land within the planning area; however, the CAP may indirectly influence land use decisions through this action, by establishing policies and programs to concentrate development and related infrastructure within the TPAs.

The 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. The CAP does not propose large-scale transportation improvements; rather, the CAP quantifies the GHG reduction potential of locating future growth within TPAs, which are centered on the transportation and transit system improvements planned for in the RTP/SCS. The CAP supports the land use strategy in the RTP/SCS by encouraging community plans to direct growth within TPAs.

The General Plan's City of Villages strategy provides an overarching land use strategy for San Diego that is implemented through individual community land use plans. As described in General Plan policy LU-A.1, the City of Villages strategy encourages the intensification of employment uses in subregional employment districts, increases residential and commercial density near transit corridors, and encourages mixed-use development.

Because TPAs are located in proximity to key transportation corridors and transit routes, a land use conflict could occur if villages were located within TPAs near existing uses that could be affected by increased development density, such as land within an airport zone, adjacent to open space or other protected natural resources, or in areas that are designated for very low-density residential or agricultural uses.

Localized land use conflicts would be examined through implementation of General Plan policy LU.A-5, which requires that environmental review of potential village locations during the community update process "with input from recognized community planning groups and the general public, to determine if these locations are appropriate for mixed-use development and village design." Prior to adoption, every community plan would undergo environmental review to analyze the potential for local impacts due to land use changes in TPAs. In addition, implementation of the City of Villages strategy is accommodated through application of the City's Urban Village Overlay Zone, pursuant to §132.1101 et seq. of the Land Development Code, which is intended to create a mix of land uses in a compact pattern that will reduce dependency on the automobile, improve air quality, and promote high quality, interactive neighborhoods, as specified in Action 3.1. Much of the development called for in the CAP would occur within this overlay zone.

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 the project. The City would review future proposed plans and projects for consistency with the policies in the General Plan, community plans, and the Zoning Code. The San Diego County Regional Airport Authority (Authority), acting as the Airport Land Use Commission (ALUC), would review future proposed land use plans and



policies for all community plan updates for consistency with airport land use compatibility plans and the military air installations compatible use zone studies for consistency with applicable land use regulations. The Coastal Commission would also review all proposed community land use plans for compatibility with the Coastal Zone regulations.

### Significance of Impact

As described above, 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.

### Mitigation Framework

#### **Mitigation Measure LU-1: Siting of Large-scale Renewable Energy Projects.**

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 prior to permitting any large-scale renewable energy projects. 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 at a minimum:

- 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.
- 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.
- 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; ~~and~~ minimizing visual prominence (for example, by avoiding siting of facilities on ridgelines and other prominent topographical features, or by providing vegetative screens); and minimizing lighting and glare effects (such as adherence to the City's Outdoor Lighting Regulations).
- 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.
- 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.

- A checklist to determine whether, even with adherence to the guidelines provided, a facility may still result in a land use conflict.

### 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).

### *Issue 2: Would implementation of the CAP conflict with the environmental goals, objectives, or recommendations of the General Plan or affected community plans?*

As discussed in Chapter 1, Introduction and Environmental Setting, 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 General Plan contains Policy CE-A.2:

Reduce the City's carbon footprint. Develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth in the General Plan to:

- Create sustainable and efficient land use patterns to reduce vehicular trips and preserve open space;
- Reduce fuel emission levels by encouraging alternative modes of transportation and increasing fuel efficiency;
- Improve energy efficiency, especially in the transportation sector and buildings and appliances;
- 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;
- Reduce waste by improving management and recycling programs; and
- Plan for water supply and emergency reserves.

In general, the CAP would be consistent with this policy as it would further its implementation, since it contains strategies, actions, and supporting measures aimed at each of the specific points contained in the policy. Specifically, CAP Action 3.1, which implements the City of Villages land use strategy, is consistent with Policy CE-A.2, since it facilitates the concentration of future development in the TPAs.

At the time that the General Plan was adopted, the City had already adopted its Climate Protection Action Plan (CPAP). The CPAP was approved in 2005, and focused on reducing emissions from municipal operations. The General Plan contains Policy CE-A.13, which lays out the requirements for updating, expanding, and implementing the CPAP:

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.

- a. Inventory greenhouse gas emissions, including emissions for the City community-at-large, and for the City as an organization.
- b. Identify actions and programs designed to reduce the climate change impacts caused by the community-at-large and the City as an organization.

The CAP would implement Policy CE-A.13, since it updates the City's Climate Protection Action Plan to be consistent with current federal, State, and local laws; provides a new community GHG inventory, and identifies actions and programs to reduce GHG emissions and increase community resiliency to climate change.

Chapter 3 of the CAP indicates the General Plan policies that support each CAP strategy.

**Table 3.A-2** relates these General Plan policies to the proposed CAP actions. As shown in the table, each proposed CAP action is consistent with several General Plan policies. The Table also provides an indication of how each CAP action is consistent with other adopted environmental plans and policies. As shown in Table 3.A-2, the CAP would implement and be consistent with many of the environmental policies in the General Plan and community plans. For example, Strategy 3 and its related actions would facilitate implementation of the General Plan's City of Villages strategy and community plans that provide neighborhood-level planning for the City of Villages strategy. Actions 2.1 and 2.2 in the CAP would implement General Plan policies which prioritize the development of sustainable energy (policies CE-I.2, CE-I.3, CE-I.5, CE-I.10, and CE-I.11). Actions 1.3, 1.4, and 1.5 would implement General Plan policies to reduce water demand (policies PF-H.1 and CE-D.1-4). Action 4.1 would implement General Plan policy to divert solid waste from landfills and extend the useful life of existing landfills (policy PF-I.2), and Action 5.1 would implement General Plan policies to plant shade trees and expand the City's urban tree canopy (policies CE-J.1 and CE-J.4).

With regard to the community plans, as noted in the Regulatory Setting section above, each community planning area has its own land use plan that specifically addresses land use distribution and land use designations in more detail than is possible at the General Plan level. Community plans also provide policy for community facilities, urban design and other aspects of community planning. The City is in the process of updating community plans to reflect the policy changes of the General Plan, particularly to add specificity to the City of Villages strategy. The CAP strategies and actions are intended to support and facilitate implementation of the community plans that have already been updated to incorporate the City of Villages strategy. 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.

**TABLE 3.A-2  
MATRIX OF CAP ACTIONS/PLAN CONSISTENCY**

CAP Strategies/Actions	Target	GP Supporting Policies	Other Relevant Plans and Plan Policies
<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.	<ul style="list-style-type: none"> <li>• CE-I.7 Energy Efficiency Investments</li> <li>• CE-I.5b Renewable Energy Installation for New and Existing Buildings</li> <li>• CE-I.13 Energy Conservation Education</li> </ul>	<ul style="list-style-type: none"> <li>• Proposition D - height limitations west of I-5 for solar rooftop installations</li> <li>• San Diego Regional Air Quality Strategy (RAQS) - emissions exceedances possible during construction of retrofits</li> <li>• San Diego Historical Resources Guidelines - retrofit alterations to historic buildings</li> <li>• Senate Bill 226 – exemption for rooftop solar</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.	<ul style="list-style-type: none"> <li>• CE-I.7 Energy Efficiency Investments</li> <li>• CE-I.5b Renewable Energy Installation for New and Existing Buildings</li> <li>• CE-I.4 Water Conservation and Waste Diversion</li> </ul>	<ul style="list-style-type: none"> <li>• San Diego Regional Air Quality Strategy (RAQS) - emissions exceedances possible during construction of retrofits</li> <li>• San Diego Historical Resources Guidelines - retrofit alterations to historic buildings</li> <li>• Senate Bill 226– exemption for rooftop solar</li> </ul>
Action 1.3 New Water Rate and Billing Structure	Reduce daily per capita water consumption by four gallons by 2020 and nine gallons by 2035 from a potential new water rate billing structure	<ul style="list-style-type: none"> <li>• CE-A.11h Implement Water Conservation Measures</li> <li>• CE-D.1h Water Conservation Incentives</li> <li>• CE-D.1i Water Shortage Response Plan</li> <li>• CE-D.1j Conservation Enforcement</li> <li>• CE-D.1m Water Conservation Education</li> <li>• CE-I.4 Water Conservation and Waste Diversion</li> </ul>	<ul style="list-style-type: none"> <li>• City of San Diego Urban Water Management Plan (UWMP) - for implementing water conservation measures</li> <li>• San Diego County Water Authority UWMP- for implementing water conservation measures</li> <li>• San Diego Integrated Water Management Plan (IRWMP) – for reduction in use of groundwater or any alteration of groundwater resources</li> </ul>
Action 1.4 Water Conservation, Disclosure, and Benchmarking Ordinance	Reduce daily per capita water consumption by four gallons by 2020 and nine gallons by 2035.	<ul style="list-style-type: none"> <li>• CE-A.11h Implement Water Conservation Measures</li> <li>• CE-D.1j Conservation Enforcement</li> <li>• CE-D.1k Water Conservation Technology</li> <li>• CE-D.1l Update Landscaping Regulations</li> <li>• CE-D.1m Water Conservation Education</li> <li>• CE-I.4 Water Conservation and Waste Diversion</li> </ul>	<ul style="list-style-type: none"> <li>• City of San Diego Urban Water Management Plan (UWMP) - for implementing water conservation measures</li> <li>• San Diego County Water Authority UWMP- for implementing water conservation measures</li> <li>• San Diego Integrated Water Management Plan (IRWMP) – for reduction in use of groundwater or any alteration of groundwater resources</li> </ul>
Action 1.5: Outdoor Landscaping Ordinance	Reduce daily per capita water consumption by an additional three gallons by 2020 and an additional five gallons by 2035.	<ul style="list-style-type: none"> <li>• CE-A.11e Lawn Replacement</li> <li>• CE-A.11h Implement Water Conservation Measures</li> <li>• CE-A.11i Reduce Potable Water Use for Irrigation</li> <li>• CE-D.1i Water Shortage Response Plan</li> <li>• CE-D.1k Water Conservation Technology</li> <li>• CE-D.1l Update Landscaping Regulations</li> <li>• CE-D.1m Water Conservation Education</li> <li>• CE-I.4 Water Conservation and Waste Diversion</li> </ul>	<ul style="list-style-type: none"> <li>• City of San Diego Urban Water Management Plan (UWMP) - for implementing water conservation measures</li> <li>• San Diego County Water Authority UWMP- for implementing water conservation measures</li> <li>• San Diego Integrated Water Management Plan (IRWMP) – for reduction in use of groundwater or any alteration of groundwater resources</li> </ul>

**TABLE 3.A-2 (Continued)  
MATRIX OF CAP ACTIONS/ PLAN CONSISTENCY**

CAP Strategies/Actions	Target	GP Supporting Policies	Other Relevant Plans and Plan Policies
<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	<ul style="list-style-type: none"> <li>• CE-I.5 Photovoltaic/ Renewables Installation</li> <li>• CE-I.10 Renewable Energy Procurement</li> <li>• CE-I.11 Renewable Energy Incentives</li> <li>• CE-A.5 Sustainable Buildings/ Renewables</li> <li>• CE-A.6 Renewables on City Buildings</li> <li>• UD-A.4 Sustainable Buildings/ Renewables</li> </ul>	<ul style="list-style-type: none"> <li>• Land Development Code – renewable systems must comply with LDC</li> <li>• City’s Various Parks, Open Space, and Natural Resource Plans – may be effected due to siting of renewable systems</li> <li>• SD County MSCP Subarea Plan – renewable system installation may affect lands within or in proximity to the MSCP Subarea</li> <li>• Biological Resource Guidelines – system installation must comply with guidelines</li> <li>• Environmentally Sensitive Lands (ESLs) Regulations – system installation must comply with regulations</li> <li>• Airport Land Use Commission (ALUC) for San Diego County – systems installed within or in proximity to ALUC plan must be consistent</li> <li>• Air Installations Compatible Use Zones (AICUZ) Studies– systems installed within or in proximity to AICUZ areas must be consistent</li> <li>• Caltrans Scenic Highway Program – installation of systems may affect views along scenic highways</li> <li>• San Diego Regional Air Quality Strategy (RAQS) - emissions exceedances possible during construction of systems</li> <li>• Regional Energy Strategy (RES) 2030 – is this goal consistent with the RES? Does RES support or can County support such significant increases in renewables?</li> <li>• Senate Bill 226– exemption for rooftop solar</li> </ul>
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.	<ul style="list-style-type: none"> <li>• CE-A.2 Reduce City's Carbon Footprint</li> </ul>	<ul style="list-style-type: none"> <li>• None</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.	<ul style="list-style-type: none"> <li>• CE-A.2 Reduce City's Carbon Footprint</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>

**TABLE 3.A-2 (Continued)**  
**MATRIX OF CAP ACTIONS/ PLAN CONSISTENCY**

CAP Strategies/Actions	Target	GP Supporting Policies	Other Relevant Plans and Plan Policies
<b>Strategy 3: Bicycling, Walking, Transit &amp; Land Use</b>			
Action 3.1 Mass Transit	Achieve mass transit mode share of 12 percent by 2020 and 25 percent by 2035 in Transit Priority Areas (TPA).	<ul style="list-style-type: none"> <li>• CE-F.1 Reduce Fossil Fuel Use</li> <li>• ME-E.6 Alternative Modes of Transportation for New Development</li> <li>• ME-B.9 Transit Planning</li> <li>• LU-A.7 Increased/ Transit Supportive Density</li> </ul>	<ul style="list-style-type: none"> <li>• Land Development Code – renewable systems must comply with LDC</li> <li>• San Diego Regional Air Quality Strategy (RAQS) - emissions exceedances possible during construction of systems</li> <li>• SANDAG RTP/SCS – TPA development must support goals of RTP/SCS</li> </ul>
Action 3.2: Commuter Walking	Achieve walking commuter mode share of three percent by 2020 and seven percent by 2035 in TPA.	<ul style="list-style-type: none"> <li>• CE-A.2 Reduce City's Carbon Footprint</li> <li>• ME-E.6 Alternative Modes of Transportation for New Development</li> <li>• ME-B.9 Transit Planning</li> <li>• ME-C.4 Street and Sidewalk Operations</li> </ul>	<ul style="list-style-type: none"> <li>• San Diego Regional Air Quality Strategy (RAQS) - emissions exceedances possible during construction of systems</li> <li>• San Diego Pedestrian Master Plan – would be implemented under this action</li> </ul>
Action 3.3 Commuter Bicycling	Achieve six percent bicycle commuter mode share by 2020 and 18 percent mode share by 2035 in Transit Priority Areas.	<ul style="list-style-type: none"> <li>• CE-A.2 Reduce City's Carbon Footprint</li> <li>• ME-E.6 Alternative Modes of Transportation for New Development</li> <li>• ME-F.5 Increase Bicycle to Transit Trips</li> <li>• ME-F.6 Bicycle Safety Education</li> <li>• ME-C.4 Street and Sidewalk Operations</li> </ul>	<ul style="list-style-type: none"> <li>• San Diego Regional Air Quality Strategy (RAQS) - emissions exceedances possible during construction of systems</li> <li>• San Diego Bicycle Master Plan – would be implemented under this action</li> </ul>
Action 3.4 Retiming Traffic Signals	Retime 200 traffic signals by 2020.	<ul style="list-style-type: none"> <li>• CE-A.2 Reduce City's Carbon Footprint</li> <li>• CE-F.1 Reduce Fossil Fuel Use</li> <li>• CE-F.5 Reduce Emissions from Motors</li> <li>• ME-C.4 Street and Sidewalk Operations</li> </ul>	<ul style="list-style-type: none"> <li>• None</li> </ul>
Action 3.5 Install Roundabouts	Install roundabouts at 15 intersections by 2020 and an additional 20 intersections by 2035.	<ul style="list-style-type: none"> <li>• CE-A.2 Reduce City's Carbon Footprint</li> <li>• CE-F.1 Reduce Fossil Fuel Use</li> <li>• ME-C.4 Street and Sidewalk Operations</li> </ul>	<ul style="list-style-type: none"> <li>• San Diego Regional Air Quality Strategy (RAQS) during retrofit construction</li> </ul>
Action 3.6 Reduction in Commute Miles	Reduce average vehicle commute distance by two miles through implementation of the General Plan City of Villages Strategy by 2035.	<ul style="list-style-type: none"> <li>• CE-A.2 Reduce City's Carbon Footprint</li> <li>• CE-F.1 Reduce Fossil Fuel Use</li> <li>• ME-E.6 Alternative Modes of Transportation for New Development</li> <li>• ME-F.5 Increase Bicycle to Transit Trips</li> <li>• ME-B.9 Transit Planning</li> <li>• LU-A.7 Increased/ Transit Supportive Density</li> </ul>	<ul style="list-style-type: none"> <li>• Land Development Code</li> <li>• City Natural Resource Plans</li> <li>• SD County MSCP Subarea Plan and Biological Resource Guidelines</li> <li>• San Diego Regional Air Quality Strategy (RAQS) during construction</li> <li>• San Diego Historical Resources Guidelines with increased density</li> <li>• SANDAG RTP/SCS</li> </ul>

**TABLE 3.A-2 (Continued)  
MATRIX OF CAP ACTIONS/ PLAN CONSISTENCY**

CAP Strategies/Actions	Target	GP Supporting Policies	Other Relevant Plans and Plan Policies
<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	<ul style="list-style-type: none"> <li>• CE-A.2 Reduce City's Carbon Footprint</li> <li>• CE-A.8 Reduce C&amp;D Waste</li> <li>• CE-A.9 Reduce C&amp;D Waste</li> <li>• CE-E.6 Pollution Control</li> <li>• CE-M.3 International Pollution Control Coordination</li> <li>• CE-N.4 Reduce Energy Waste</li> <li>• CE-N.7 Waste Diversion Education</li> <li>• PF-I.1 Waste Collection Efficiency</li> <li>• PF-I.2 Waste Diversion</li> </ul>	<ul style="list-style-type: none"> <li>• San Diego Regional Air Quality Strategy (RAQS) during retrofit or new facility construction, Construction and Demolition Debris Ordinance</li> <li>• ARB Landfill Methane Control Regulation</li> <li>• AB 939 and amendments and required planning documents.</li> </ul>
Action 4.2 Capture Methane from Wastewater Treatment	Capture 98 percent wastewater treatment gases by 2035.	<ul style="list-style-type: none"> <li>• CE-A.2 Reduce City's Carbon Footprint</li> </ul>	<ul style="list-style-type: none"> <li>• San Diego Regional Air Quality Strategy (RAQS) during retrofit construction</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	<ul style="list-style-type: none"> <li>• CE-A.2 Reduce City's Carbon Footprint</li> <li>• CE-J.1 Urban Forestry</li> <li>• CE-J.2 Street Tree Master Plan</li> <li>• CE-J.3 Street Tree Master Plan Development</li> </ul>	<ul style="list-style-type: none"> <li>• City of San Diego Urban Water Management Plan (UWMP) – would this result in a significant increase in demand for water that City cannot supply?</li> </ul>

**Significance of Impact**

As described above, implementation of the CAP would not conflict with the environmental goals, objectives, or recommendations of the General Plan; rather, the CAP is consistent with implements the environmental goals, policies, and recommendations of the General Plan. Therefore, this impact is less than significant.

**Mitigation Framework**

No mitigation is required.

***Issue 3: Would implementation of the CAP result in a conflict with an adopted environmental plan or other approved local, regional or State habitat conservation plan?***

As described above, the applicable habitat conservation plan within the City is the MSCP Subarea Plan. Other adopted environmental regulations include the City's Environmentally Sensitive Lands (ESL) ordinance, a part of the City's Land Development Code, and the related Biology Guidelines.

The City's MSCP Subarea Plan identifies Park, Open Space, and Recreation uses in the General Plan that are protected from development through implementation of the Subarea Plan Land Use Considerations (Section 1.4.1 to 1.4.3). The ESL Ordinance applies to all sensitive biological resources as well as environmentally sensitive lands, including steep hillsides, beaches, coastal bluffs, and special flood hazard areas.

Action 2.1 of the CAP could indirectly result in the construction of large-scale renewable energy generation, transmission, and storage systems, in order to support achievement of the CAP goal to supply 100 percent renewable energy to the City's power grid by the year 2035. It is anticipated that within the City limits, the majority of these systems would be located outside of biologically sensitive lands, with favored locations in industrial and commercial areas, such as roof tops, industrial brownfields, and parking lots. 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 directly 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 support the goals of the CAP would be subject to the ESL Ordinance, Section 143.0101 et seq. 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.



Outside of the City limits, development of large-scale renewable energy facilities may occur on private or public lands. Such developments could be proposed for locations within the boundaries of adopted habitat conservation plans or other environmental plans. In such cases, it would be the responsible of the agency with land use authority over the project site to ensure that such developments were compatible with the requirements of any such plans. Therefore, conflicts either would not occur, or would have to be resolved by the local agency. In either case, it is anticipated that any impacts on sensitive biological resources would be identified and mitigated through the planning process for proposed facilities.

CAP Action 3.1 would facilitate the implementation of the General Plan City of Villages land use strategy, through supporting measures that encouraging new development within TPAs, prioritizing infrastructure improvements in TPAs, and implementing bicycle and pedestrian facilities improvements. More site-specific planning for TPAs is contained in the community plans, or will be added to community plans that have not yet been updated to reflect the City of Villages strategy.

The TPAs are generally urbanized areas centered on existing transit corridors. Action 3.1 would not in itself result in any changes to any environmentally sensitive lands. Action 3.1 could result in or facilitate changes to land uses or construction of new developments and transportation facilities in proximity to the MHPA or other environmentally sensitive lands. As with all developments within the City, such projects would be subject to the restrictions and requirements of the regulations contained in the MSCP Subarea Plan, the ESL Ordinance, and the Biology Guidelines. For these reasons, adoption and implementation of the CAP would not be expected to conflict with any local, regional, or State habitat conservation plan. The impact is, therefore, less than significant.

### **Significance of Impact**

For the reasons stated above, the project is not expected to conflict with an adopted environmental plan or other approved local, regional or State habitat conservation plan. This impact is therefore less than significant.

### **Mitigation Framework**

No mitigation is required.

## **B. Visual Effects and Neighborhood Character**

### **B.1 Introduction**

This section of the PEIR analyzes the potential environmental effects on visual resources and neighborhood character from implementation of the City of San Diego (City) Draft Climate Action Plan (CAP).

### **B.2 Environmental Setting**

#### **Regional Setting**

The San Diego region is a visually diverse region rich in natural open space, topographic resources, scenic highways, scenic vistas, and other distinct aesthetic resources. San Diego's location bordering the Pacific Ocean also contributes to the natural setting of the region. The topography of the region contributes greatly to the overall character and quality of the existing visual setting. In general terms, the region is characterized by four physiographic regions: the low-lying coastal plain, the foothills, the mountains, and the lowlands of the desert. The visual character of each is described briefly below.

The coastal plain ranges in elevation from sea level to approximately 600 feet above mean sea level (AMSL) and includes beaches; bays; shoreline; coastal canyons; and the rivers, streams, and other watercourses that drain inland areas, eventually reaching the coastal environment and waters. The coastal plain provides expansive views of scenic resources in all directions, with the coastline visible from regional transportation facilities including the Los Angeles to San Diego (LOSSAN) rail corridor and Interstate 5 (I-5). Much of the coastal plain is developed with urban land uses. Agricultural uses within the coastal area include row crops, field flowers, and greenhouses.

The foothills of the San Diego region range in elevation from 600 to 2,000 feet AMSL and are characterized by rolling to hilly uplands that contain frequent narrow, winding valleys. This area is traversed by several rivers, as well as a number of intermittent drainages. Several side canyons have incised the coastal plain and created major drainages that generally flow westward toward the coast. These major drainages are the San Dieguito River Valley, Los Peñasquitos Creek, Carroll Creek, Rose Creek, San Diego River, Las Chollas Creek, Sweetwater River, Otay River, and the westernmost mouth of the Tijuana River. The foothills are also developed with various urban and rural land uses. Agriculture consists of citrus and avocado orchards as well as row crops.

The mountain region features steep-sided mountains that are typically covered with granitic boulders. Lower slopes feature chaparral vegetation. Higher elevations are host to oak woodlands and coniferous forest. Elevations range from 2,000 to 6,000 feet AMSL. The mountain areas are generally undeveloped with rural communities scattered throughout such as Alpine, Pine Valley, Campo, Ramona, and Julian.

The eastern portion of the San Diego region is within the desert zone. Elevations range from sea level to 3,000 feet AMSL and the terrain includes mountains, alluvial fans, and desert floor. The majority of this region is part of the Anza-Borrego Desert State Park. The desert region is generally undeveloped and sparsely populated in scattered towns such as the community of Borrego Springs. The desert region provides expansive views of the surrounding area, which is characterized by dramatic landforms and native desert habitats.

Throughout the coastal plain, foothills, mountains, and desert are vast amounts of publicly owned lands that provide open space and visual relief from the human-made environment. These include Marine Corps Base Camp Pendleton (MCBCP) on the coastal plain in northern San Diego region, the Cleveland National Forest in the Peninsular Range; and the Anza-Borrego Desert State park in the desert region. In addition to these examples of large expanses of open space, State, county, and local parks; habitat preserves; reservoirs; farmland; and undeveloped land lend to San Diego region's open space lands and overall aesthetic resource value.

### **Scenic Highways**

The California Scenic Highways Program is run by Caltrans and is intended to protect and enhance the natural scenic beauty of California's highways and adjacent corridors, through special conservation treatment. State Route 163 (SR-163) through Balboa Park, State Route 75 (SR-75) at the Silver Strand, and State Route 125 (SR-125) from State Route 94 (SR-94) to Interstate 8 (I-8) are the three transportation corridors in the region that are designated as State Scenic Highways; only SR-163 is completely within city limits.

### **Scenic Views and Vistas**

The coastal plain and foothills each contain numerous scenic resources and significant landscape features that contribute to the City's overall scenic quality. Major scenic resources within the coastal areas include views of the Pacific Ocean, beaches, bays, lagoons, and harbors. Notable features include San Diego Bay, Mission Bay Park, and Los Peñasquitos Lagoon. Notable features in surrounding cities that contribute to the visual character of the region include Batiquitos Lagoon, Agua Hedionda Lagoon, Buena Vista Lagoon, San Elijo Lagoon, and Oceanside Harbor. Coastal parks, including Border Field State Park, the Tijuana estuary, Silver Strand State Beach, and Torrey Pines State Reserve and Beach; and prominent land and water features, such as Cabrillo National Monument on Point Loma, Sunset Cliffs, La Jolla Cove, Mount Soledad, and the offshore Coronado Islands, are also visual resources along the coast.

Within the foothills, the prominent visual resources include rivers, lakes, open bodies of water, and parks such as the Otay River, Sweetwater River, San Diego River, Upper and Lower Otay Lakes, Sweetwater Reservoir, Lake Hodges, San Vicente Reservoir, Mission Trails Regional Park, Santee Lakes Regional Park, Tecolote Canyon, Los Peñasquitos Canyon Preserve, Old Town State Historic Park, and Presidio Park.

Public vantage points by community planning area are included in **Table 3.B-1** and generally relate to areas that face the Pacific Ocean, or other bodies of water, views overlooking canyons and open space, and views of the downtown skyline. Such views are further protected by Proposition D, which was passed in 1972 and limits the building height in areas generally west of I-5 to a maximum of 30 feet. Scenic views in the City are gradually being improved through the City's Utilities Undergrounding Program, which began in 1970 and has relocated 30-35 miles of overhead utility lines underground each year with the goal of relocating all lines within the next 50 years.

## City of San Diego

The City of San Diego is separated into unique communities and neighborhoods that are physically defined by the canyons and foothills that create natural barriers that form separate, smaller mesas. The sloping topography of the City of San Diego is shown in **Figure 3.B-1**. While development has occurred in Mission Valley and portions of other drainages, efforts to provide open space and reduce land use intensity in the San Dieguito River Valley, Los Peñasquitos Canyon, San Clemente Canyon, and the Otay River Valley allows the City of San Diego an opportunity to retain and/or develop unique communities with distinct physical separation.

The urbanization of San Diego began around 1869 when Alonzo Horton moved the center of commerce and government from Old Town (Old San Diego) to New Town (Downtown). Development spread from Downtown based on a variety of factors, including the availability of potable water and transportation corridors. Factors such as views and access to public facilities affected land values, which in turn affected the character of neighborhoods that developed. Neighborhoods were developed around small parcels, incrementally and over a long period of time, so that many neighborhoods have a distinctive character defined by their buildings, colors, materials, and landscaping.

The City provides citywide urban design recommendations, in the Urban Design Element of the City's General Plan (2008), to maintain the character of the built environment. Some of the more recognizable architectural styles in the City are Spanish Colonial, Pre-Railroad New England, National Vernacular, Victorian Italianate, Stick, Queen Anne, Colonial Revival, Neoclassical, Shingle, Folk Victorian, Mission, Craftsman, Monterey Revival, Italian Renaissance, Spanish Eclectic, Egyptian Revival, Tudor Revival, Modernistic, International, Modern, and Contemporary. While historic development has traditionally occurred on vacant land, development is currently trending towards infill projects, including the redevelopment of a parcel or multiple parcels, as little vacant and developable land remains within the City.

These neighborhoods and communities are connected by the interstate and highway system, major arterial freeways, highways, surface streets, public transportation routes, bikeways and open space trails. Local connectivity is also provided by public transit, including buses and regional light rail, with interstate and international connectivity provided through trains, interstate freeways, and the federal ports of entry to the Republic of Mexico.

**TABLE 3.B-1  
COMMUNITY PLAN IDENTIFIED VANTAGE POINTS**

<b>Community</b>	<b>Identified Public Vantage Point</b>	<b>Description</b>
Barrio Logan / Harbor 101	Harbor Drive Bridge over Switzer Creek	Views to the San Diego Bay
	Chollas Creek	Views to the San Diego Bay
	28th Street and Harbor Drive	Views toward I-5, SR-15 freeway interchanges (major sculptural feature)
	Logan Avenue	Centre City skyline and major industrial waterfront features
	National Avenue	Centre City skyline and major industrial waterfront features
	Northern portion of community	Centre City skyline and major industrial waterfront features
Black Mountain Ranch	Northern portion of community	Views overlooking the canyon and open space
Carmel Mountain Ranch	I-15	Views into the southern portion of the community
	Communitywide	Views facing outside the community from open space areas in the south central portion of the community
Carmel Valley	Views not in current community plan	
Clairemont Mesa	Designated open spaces west of Clairemont Drive	Views facing west to Mission Bay and Pacific Ocean
	Communitywide	Many neighborhoods along the mesa overlook Mission Bay and the Pacific Ocean to the west, Fortuna Mountain and Cowles Mountain to the east and the open space canyon system
College Area	Views not in current community plan	
Del Mar Mesa	Views not in current community plan	
Elliott	Views not in current community plan	
Fairbanks Ranch Country Club	Views not in current community plan	
Golden Hill	Citywide	Structures should be designed to protect views of Golden Hill's natural scenic amenities, especially San Diego Bay, the Coronado Bay Bridge, Balboa Park, Switzer Canyon and the 32nd Street and 34th Street canyons
Greater North Park	Views not in current community plan	
Kearny Mesa	I-805, SR-52 & I-15	Create attractive views toward the community
La Jolla	Torrey Pines City Park	Viewshed overlooking coast
	La Jolla Farms Road	Scenic Overlook and Intermittent or Partial Vista looking west towards the coast
	Scripps Natural Reserve	Viewshed overlooking coast
	Bluff - top easement at La Jolla Shores Lane	View Cone overlooking coast
	Ellentown Road	Scenic Overlook looking west towards the coast
	La Jolla Shores Drive from Torrey Pines Road	Intermittent or Partial Vista looking west towards the coast
	La Jolla Shores Drive looking south from the vicinity of Scripps Institute of Oceanography	Viewshed overlooking coast, Scenic Overlook, Intermittent or Partial Vista, and a road from which coastal body of water can be seen
	Allen Field	Viewshed looking west towards the coast
	Bordeaux Avenue (western half)	Scenic Overlook looking west towards the coast
	El Paseo Grande (after it turns east)	View corridor and a road from which coastal body of water can be seen.
	Camino del Oro (after it turns east)	Road from which coastal body of water can be seen
	Whale Watch Way	Intermittent or Partial Vista looking west towards the coast

**TABLE 3.B-1 (Continued)**  
**COMMUNITY PLAN IDENTIFIED VANTAGE POINTS**

<b>Community</b>	<b>Identified Public Vantage Point</b>	<b>Description</b>
La Jolla (cont.)	Cliffridge Park	Viewshed looking west towards the coast
	Kellogg Park	Viewshed overlooking coast and beach
	Calle Frescota	View corridor looking west towards the coast
	Prestwick Drive	Intermittent or Partial Vista looking west towards the coast
	Vallecitos	View corridor looking west towards the coast
	Avenida de la Playa	View corridor looking west towards the coast
	Calle del Cielo	Views looking west towards coast
	Pottery Canyon Park	Scenic Overlook looking west towards the coast
	Costabelle Drive	Scenic Overlook looking west towards the coast
	Spindrift Drive (south of the Marine Room Restaurant)	Viewshed looking west towards coast
	Charlotte Park (at the foot of Charlotte Street)	View Cone and View Corridor overlooking coast
	Coast Boulevard, Children's Pool, Shell Beach, Ellen B. Scripps Park and La Jolla Cove	Viewshed along coast looking north, east and west
	Prospect Street and Cave Street	View Cone and View Corridor overlooking coast
	Coast Walk	View Cone overlooking coast
	Park Row (north end)	View Corridor looking north towards the coast
	Torrey Pines Road	Road from which coastal body of water can be seen looking north towards the coast
	Public open space on Torrey Pines Road between St. Louis Terrace and Calle de la Plata	Intermittent or Partial Vista looking north towards the coast
	Azure Coast Drive	Views looking west towards coast
	Hidden Valley Road	Intermittent or Partial Vista looking west towards the coast
	Ardath Road	Road from which coastal body of water can be seen looking west towards
	Girard Avenue	the coast
	Jenner Street	Scenic Overlook northwest towards the coast
	View corridor easement through 7963 Prospect Place to ocean	View Corridor looking northwest towards the coast
	Easement across from John Coal Book Store from Prospect Street and Recreation Center	Scenic Overlook west towards the coast
	Hillside Drive (portions)	Scenic Overlook west towards the coast
	Caminito Avola/Via Avola	Scenic Overlook west towards the coast
	Via Siena at Hillside Drive	View Cone looking north, east and west towards the coast
	Rue Denise	View Cone looking north, east and west towards the coast
	La Jolla Scenic Drive South (portions)	Scenic Overlook northwest towards the coast
	Mt. Soledad (north of Ardath Rd)	Scenic Overlook northwest towards the coast
	Rue Adriane	View Cone looking east towards canyons
	Rue Michael	Scenic Overlook towards the coast
	Senn Way	Scenic Overlook towards the coast
Rue de Roark	Scenic Overlook towards the coast	
Coast Boulevard Park and South Coast Boulevard	Scenic Overlook towards the coast	
View corridor at southwest side of Scripps Hotel site, from Prospect Street	Viewshed south and west along the coast	

**TABLE 3.B-1 (Continued)**  
**COMMUNITY PLAN IDENTIFIED VANTAGE POINTS**

<b>Community</b>	<b>Identified Public Vantage Point</b>	<b>Description</b>
La Jolla (cont.)	La Jolla Community Center Park, Cuvier Street	View corridor west towards the coast
	From top of Cuvier Street at Prospect	View Cone looking west towards the coast
	Via Capri (portions)	View corridor northwest towards the coast
	Mount Soledad	Viewshed panoramic views north, south, west, and east
	Country Club Drive	Scenic Overlook towards the coast
	Marine Street (Jones Beach)	View corridor west towards the coast
	Sea Lane	View corridor west towards the coast
	Belvedere Street	View corridor west towards the coast
	West Muirlands Drive	Scenic Overlook towards the coast
	Neptune Place and La Jolla Strand Park	Road from which coastal body of water can be seen looking west towards the coast
	Westbourne Street	View corridor west towards the coast
	Nautilus Street	View corridor west towards the coast and road from which coastal body of water can be seen looking west towards the coast
	Muirlands Drive between Nautilus and La Jolla Mesa Drive	Intermittent or Partial Vista looking west towards the coast
	Soledad Mountain Rd	Intermittent or Partial Vista looking south towards downtown and the coast
	Windandsea Park	View Cone looking west along the coast
	El Camino del Teatro	Scenic Overlook towards the coast
	Portions of La Jolla Scenic Drive South	Road from which coastal body of water can be seen looking south and west towards the coast
	Bonair Street	View corridor west towards the coast
	Plaza del Norte and Playa del Sur	Intermittent or Partial Vista west along the coast
	Gravilla Street	View corridor west towards the coast
	Kolmar Street	View corridor west towards the coast
	Rosemont Street	View corridor west towards the coast
	Palomar Street	View corridor west towards the coast
	Fay Avenue	Bike Path Views of open space, canyons
	Inspiration Drive	Scenic Overlook towards the coast
	Hermosa Terrace Park	Viewshed south and west along the coast
	Newkirk Drive	Scenic Overlook towards the coast
	Rodeo Drive	Scenic Overlook towards the coast
	Via Espana	Scenic Overlook towards the coast
	Camino de la Costa (includes Cortez Place, Costa Place)	Viewshed south and west along the coast
	Desert View Drive	Intermittent or Partial Vista towards the coast
	La Jolla Rancho Road	Scenic Overlook towards the coast
	Ravenswood Road	Intermittent or Partial Vista towards the coast
	La Jolla Hermosa Park	Viewshed north and west along the coast
La Jolla Mesa Drive (from Cottontail Lane to Skylark Street)	Road from which coastal body of water can be seen looking south and west towards the coast	
Moss Lane, off Dolphin Place	View Cone at the coast	
Bird Rock Avenue	View corridor west towards the coast	
Dolphin Place	Intermittent or Partial Vista towards the coast	
Coral Lane	View corridor west towards the coast	
Chelsea Place	Intermittent or Partial Vista towards the coast	
Forward Street	Viewshed looking south towards the coast	

**TABLE 3.B-1 (Continued)**  
**COMMUNITY PLAN IDENTIFIED VANTAGE POINTS**

Community	Identified Public Vantage Point	Description
La Jolla (cont.)	Midway Street	Viewshed looking south towards the coast
	Colima Street (end of road closest to the ocean)	Scenic Overlook towards the coast
	Calumet Park	Viewshed south and west along the coast
	San Colla Street	Scenic Overlook towards the coast
	Ricardo Place	Scenic Overlook towards the coast
	Bandera Street	View corridor west towards the coast
	Sea Ridge Drive	Intermittent or Partial Vista towards the coast
	Linda Way	View corridor south towards the coast
	Tourmaline Surfing Park	View corridor and view cone west towards the coast
	La Canada Canyon	Viewshed west towards the coast
	Princess Street	View Cone north overlooking the coast
Linda Vista	Tecolote Canyon	Protect public views from the canyon
Mid-City	Communitywide	Framed views of existing aesthetic resources such as parks and community landmarks
	Communitywide	Panoramic views of the bay, open spaces, and mountains from street rights-of-way and other public areas
Midway/Pacific Highway Corridor	Pacific Highway between Sassafra Street and Laurel Street	Preserve scenic vistas to the bay and other coastal areas and utilize building design along view corridors to enhance views to the waterfront from public rights-of-way
Mira Mesa	Los Penasquitos Canyon Preserve	Provide view of canyon with scenic overlooks
Miramar Ranch North	Miramar Lake	Views from and of these areas across the lake
	Western escarpment of community	Maintain views to the ocean while providing a high quality visual experience to onlookers from the mesas below to the west
Mission Beach	Views not in current community plan	
Mission Valley	Communitywide	Views should be provided from public streets into the river corridor
	Communitywide	Aerial views from the hillsides into the river area from public areas such as
Navajo	Views not in current community plan	
Old Town	Views not in current community plan	
Otay Mesa	Communitywide	Preserve privacy and views
Otay Mesa - Nestor	Palm Avenue Transit Center/Park-and-Ride	Provide a viewpoint overlooking the valley, north of the trolley station parking lot. Provide physical access, via a stairway, into the valley
	Midway Baptist Church	Encourage the Church to provide a public viewpoint overlooking the valley
	Palm Avenue	This site is the only area between I-5 and I-805 that provides direct views into the valley from Palm Avenue. Preserve visual access and provide a public viewpoint from Palm Avenue. Provide public trail and vehicular access along the existing unimproved road alignment from Palm Avenue into the valley.
	Montgomery High School	Provide pedestrian access through the school campus to the sites north of the ball fields and stadium. Improve this area of natural bluffs overlooking the valley as a passive recreation and viewing area



**TABLE 3.B-1 (Continued)**  
**COMMUNITY PLAN IDENTIFIED VANTAGE POINTS**

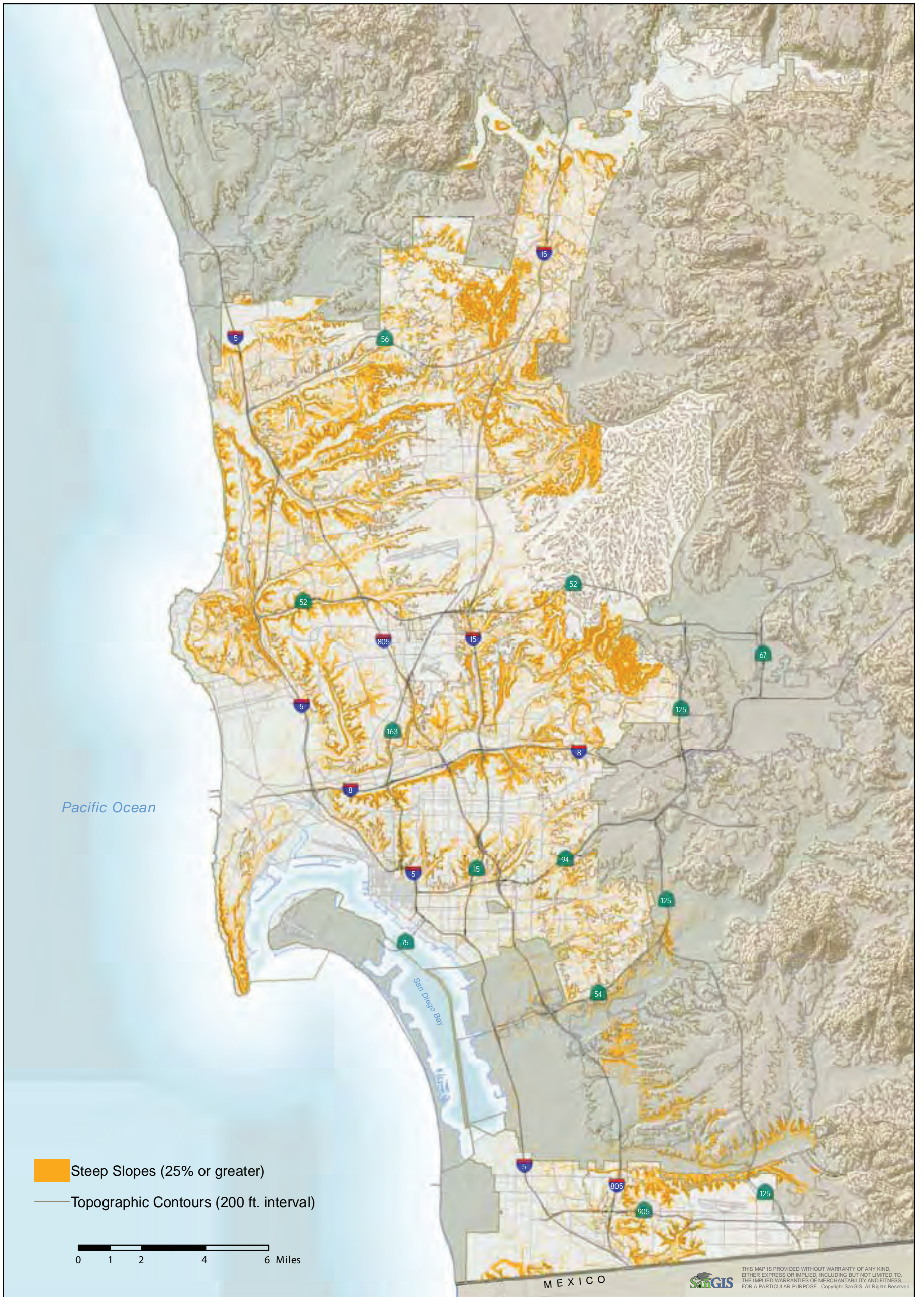
Community	Identified Public Vantage Point	Description
Otay Mesa – Nestor (cont.)	Cochran Avenue	This site is proposed as a mini park. Provide a public viewpoint overlooking the valley, including landscaping and seating. Design of this area should prevent vehicular access north of Lindberg Street, and should discourage and prevent trash dumping over the cliff
	Finney Elementary School	Provide pedestrian access through the school campus to the north of the ball field and playground. Improve this area of natural bluffs overlooking the valley and finger canyons as a passive viewing area
	Murrieta Circle	An existing utility easement road provides access from Murrieta Circle down to the valley. Work with SDG&E to provide public access to this trailhead and viewpoint overlooking the valley.
	Servando Avenue	Provide viewpoints along the alignments of Valentino Street and Bluehaven Court by clearing non-sensitive vegetation along the south side of this street, adjacent to the Tijuana River Valley. The viewpoints will provide aesthetic enjoyment for local residents and assist the U.S. Border Patrol in their operations
Pacific Beach	Loring Street	View corridor facing west toward the ocean
	Law Street	View corridor facing west toward the ocean
	Chalcedony Street	View corridor facing west toward the ocean
	Missouri Street	View corridor facing west toward the ocean
	Diamond Street	View corridor facing west toward the ocean
	Emerald Street	View corridor facing west toward the ocean
	Felspar Street	View corridor facing west toward the ocean
	Mission Boulevard	Intermittent public view of the ocean
	Bayard Street (south)	Intermittent public view of the ocean
	Pacific Beach Drive	Intermittent public view of the ocean
	Lamont Street	View facing south to Mission Bay
	Grand Avenue (west and central portion community)	Intermittent public view of the ocean and bay
	I-5 (southern portion of the community)	View facing south to Mission Bay
Riviera to Crown Point Drive	Views of the bay	
Pacific Highlands Ranch	Gonzales Canyon and east-west urban amenity	Open space overlook
	Near elementary school/park overlooking	Overlooking McGonigle Canyon
	McGonigle Canyon	
	South terminus of eastern neighborhood parkway	Open space overlook
	Community-wide	Utilize public view opportunities on the edge of the MHPA
Peninsula	Catalina Boulevard (southern portion)	Coastal vistas facing east and west
	Shelter Island Drive	Bay and downtown view facing north, west and south
	Rosecrans Street	Facing southeast
	Talbot Street	Facing east toward the San Diego Bay
	Canon Street	Facing southeast toward the San Diego Bay
	Garrison Street	Facing southeast toward the San Diego Bay
	Chatsworth Boulevard	Facing northeast

**TABLE 3.B-1 (Continued)**  
**COMMUNITY PLAN IDENTIFIED VANTAGE POINTS**

Community	Identified Public Vantage Point	Description
Peninsula (cont.)	West Point Loma Boulevard	Facing south/southeast
	Famosa Boulevard	Facing south
	Santa Barbara Street	Facing northwest toward the coast
	Point Loma Avenue	Facing northwest toward the coast
	Sunset Cliffs Boulevard	Coastal vistas facing west
	Sunset Cliffs Shoreline Park	Unobstructed ocean view
	Former NTC site	Southeastern view corridors from Womble Street to Sims Rd
Rancho Bernardo	Views not in current community plan	
Rancho Penasquitos	Communitywide	Public access to canyon rims and views should be provided at suitable locations in the form of paths, scenic overlooks and streets
	Communitywide	Encourage retention of wildlife habitat value in connected open space systems by providing visual access where possible by overlooks
Sabre Springs	Four viewpoints and passive areas along Chicarita Creek and Penasquitos Creek	
San Pasqual Valley	Views not in current community plan	
San Ysidro	Views not in current community plan	
Scripps Miramar Ranch	Miramar Reservoir	Public viewpoints overlooking the reservoir
	Pomerado Road	Overlooking Carroll Canyon
	SDG&E Easement (Area "E")	View toward open space
Serra Mesa	Views not in current community plan	
Skyline - Paradise Hills	Communitywide	Views of undeveloped hillsides, canyons, and mountains toward the east, should be protected
Sorrento Hills	Views not in current community plan	
Southeast	Communitywide	Care should be taken to maintain and enhance views to designated open space areas from public rights-of-way. These views should be considered in the review of discretionary permits
Tierrasanta	Communitywide	Public views toward open space including Mission Trails Regional Park and Admiral Baker Field
Tijuana River Valley	Views not in current community plan	
Torrey Highlands	Views not in current community plan	
Torrey Pines	Views not in current community plan	
University	Communitywide	Visual access to open space areas from public roadways
Uptown	Adams Avenue at Campus Avenue	Viewshed facing northwest
	10th Avenue and Johnson Avenue	Viewshed facing north/northeast
	Northern edge of 3rd Avenue	Viewshed overlooking Mission Valley
	Northern edge of Stephens Street at West Arbor Drive	Viewshed facing north toward Mission Valley
	Pringle Street at Neale Street	Viewshed facing southwest
	Laurel Street at 1Street	Viewshed facing west
Via de la Valle	San Andres Drive and Via Campestre	View facing north overlooking golf course
	West of San Andres Drive and East of Highland Drive	View facing southeast
	South of San Andres Drive and North of Via de la Valle	Views facing south

SOURCE: General Plan Final PEIR, 2007.

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SOURCE: City of San Diego Draft General Plan Final PEIR, September 2007

San Diego CAP . 140651  
**Figure 3.B-1**  
 Hillsides

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## B.3 Regulatory Setting

### Federal

There are no federal regulations that pertain to visual resources.

### State

#### ***California Scenic Highway Program***

Many State highways are located in areas of outstanding natural beauty. California's Scenic Highway Program was created by the Legislature in 1963 to preserve and protect scenic highway corridors from change that would diminish the aesthetic value of lands adjacent to highways. The State laws governing the Scenic Highway Program are found in the Streets and Highways Code, (Section 260 et seq.) The State Scenic Highway System includes a list of highways that are either eligible for designation as scenic highways or are currently designated. These highways are identified in Section 263 of the Streets and Highways Code.

A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. When a city or county nominates an eligible scenic highway for official designation, it must identify and define the scenic corridor of the highway. Because a scenic corridor is the land generally adjacent to and visible from the highway, it is identified using a motorist's line of vision. A reasonable boundary is selected when the view extends to the distant horizon.

The corridor protection program does not preclude development, but seeks to encourage quality development that does not degrade the scenic value of the corridor. Jurisdictional boundaries of the nominating agency are also considered. The agency must also adopt ordinances to preserve the scenic quality of the corridor or document such regulations that already exist in various portions of local codes. These ordinances make up the scenic corridor protection program.

#### ***Senate Bill 226***

The passage of SB 226 added section 21080.35 to the Public Resources Code, and created a new exemption under CEQA for the installation of solar energy systems, including associated equipment, on the roof of an existing building or at an existing parking lot. The SB 226 exemption applies to those systems that occupy less than 500 square feet of ground space, and includes all associated equipment that enable the generation and use of solar electricity or solar-heated water, except for substations.

### Local

The General Plan provides policies which help reduce the potential for impacts to public views. The General Plan addresses the natural environment, preserving open space systems and targeting new growth into compact villages through urban form and design policies. More specifically, the Urban Design and Conservation Elements contain policies which address development adjacent

to natural features and reduce visual impacts to scenic areas or viewsheds. Relevant policies from the General Plan are listed below.

### **General Urban Design**

- UD-A.1 Preserve and protect natural landforms and features.
- a. Protect the integrity of community plan designated open spaces (see also Conservation Element, Policy CE-B.1).
  - b. Continue to implement the Multiple Species Conservation Program (MSCP) to conserve San Diego's natural environment and create a linked open space system. Preserve and enhance remaining naturally occurring features such as wetlands, riparian zones, canyons, and ridge lines.
- UD-A.2 Use open space and landscape to define and link communities.
- a. Link villages, public attractions, canyons, open space and other destinations together by connecting them with trail systems, bikeways, landscaped boulevards, formalized parks, and/or natural open space, as appropriate.
  - b. Preserve and encourage preservation of physical connectivity and access to open space.
  - c. Recognize that sometimes open spaces prevent the continuation of transportation corridors and inhibit mobility between communities. Where conflicts exist between mobility and open space goals, site-specific solutions may be addressed in community plans.
- UD-A.3 Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.
- a. Integrate development on hillside parcels with the natural environment to preserve and enhance views, and protect areas of unique topography.
  - b. Minimize grading to maintain the natural topography, while contouring any landform alterations to blend into the natural terrain.
  - c. Utilize variable lot sizes, clustered housing, stepped-back facades, split-level units or other alternatives to slab foundations to minimize the amount of grading.
  - d. Consider terraced homes, stepped down with the slope for better integration with the topography to minimize grading in sensitive slope areas.
  - e. Utilize a clustered development pattern, single-story structures or single-story roof elements, or roofs sloped toward the open space system or natural features, to ensure that the visibility of new developments from natural features and open space areas are minimized.
  - f. Provide increased setbacks from canyon rims or open space areas to ensure that the visibility of new development is minimized.

- g. Screen development adjacent to natural features as appropriate so that development does not appear visually intrusive, or interfere with the experience within the open space system. The provision of enhanced landscaping adjacent to natural features could be used to soften the appearance of or buffer development from the natural features.
- h. Use building and landscape materials that blend with and do not create visual or other conflicts with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural vegetation for fire protection to ensure public safety in some areas.
- i. Ensure that the visibility of new development from natural features and open space areas is minimized to preserve the landforms and ridgelines that provide a natural backdrop to the open space systems. For example, development should not be visible from canyon trails at the point the trail is located nearest to proposed development. Lines-of-sight from trails or the open space system could be used to determine compliance with this policy.
- j. Design and site buildings to permit visual and physical access to the natural features from the public right-of-way.
- k. Encourage location of entrances and windows in development adjacent to open space to overlook the natural features.
- l. Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas.
- m. Preserve views and view corridors along and/or into waterfront areas from the public right-of-way by decreasing the heights of buildings as they approach the shoreline, where possible.
- n. Provide public pedestrian, bicycle, and equestrian access paths to scenic viewpoints, parklands, and where consistent with resource protection, in natural resource open space areas.
- o. Provide special consideration to the sensitive environmental design of roadways that traverse natural open space systems to ensure an integrated aesthetic design that respects open space resources. This could include the use of alternative materials such as “quiet pavement” in noise sensitive locations, and bridge or roadway designs that respect the natural environment.
- p. Design structures to be ignition and fire-resistant in fire prone areas or at-risk areas as appropriate. Incorporate fire-resistant exterior building materials and architectural design features to minimize the risk of structure damage or loss due to wildfires.

UD-A.4 Use sustainable building methods in accordance with the sustainable development policies in the Conservation Element.

UD-A.5i Maximize natural ventilation, sunlight, and views.

UD-A.8e Landscape materials and design should complement and build upon the existing character of the neighborhood.



- UD-A.9 Incorporate existing and proposed transit stops or stations into project design (see also Mobility Element, Policies ME-B.3 and ME-B.9).
- a. Provide attractively designed transit stops and stations that are adjacent to active uses, recognizable by the public, and reflect desired neighborhood character (see also Land Use Element, Policy LU-I.11).
  - b. Design safe, attractive, accessible, lighted, and convenient pedestrian connections from transit stops and stations to building entrances and street network (see also Land Use Element, Policy LU-I.10).
  - c. Provide generous rights-of-way for transit, transit stops or stations.
  - d. Locate buildings along transit corridors to allow convenient and direct access to transit stops/stations.
- UD-A.10 Design or retrofit streets to improve walkability, bicycling, and transit integration; to strengthen connectivity; and to enhance community identity. Streets are an important aspect of Urban Design as referenced in the Mobility Element (see also Mobility Element, Sections A, B, C, and F).
- UD-A.12 Reduce the amount and visual impact of surface parking lots (see also Mobility Element, Section G).
- a. Encourage placement of parking along the rear and sides of street-oriented buildings.
  - b. Avoid blank walls facing onto parking lots by promoting treatments that use colors, materials, landscape, selective openings or other means of creating interest. For example, the building should protrude, recess, or change in color, height or texture to reduce blank facades.
  - c. Design clear and attractive pedestrian paseos/pathways and signs that link parking and destinations.
  - d. Locate pedestrian pathways in areas where vehicular access is limited.
  - e. Avoid large areas of uninterrupted parking especially adjacent to community public view sheds.
  - f. Build multiple small parking lots in lieu of one large lot.
  - g. Retrofit existing expansive parking lots with street trees, landscape, pedestrian paths, and new building placement.
  - h. Promote the use of pervious surface materials to reduce runoff and infiltrate storm water.
  - i. Use trees and other landscape to provide shade, screening, and filtering of storm water runoff in parking lots (see also Conservation Element, Policy CE-A.12).
  - j. Design surface parking lots to allow for potential redevelopment to more intensive uses. For example, through redevelopment, well-placed parking lot

aisles could become internal project streets that provide access to future parking structures and mixed land uses.

- UD-B.5d Emphasize the provision of high quality pedestrian and bikeway connections to transit stops/stations, village centers, and local schools.
- UD-B.6 Utilize alleys to provide improved and alternative pedestrian access to sites. This would include consideration of a promenade or paseo design for alleys with enhanced landscaping, and residential units or uses that face the alleys to activate them as alternative pedestrian streets. This could provide an alternative function for alleys that is non-vehicular, but still provides linkages to other sites and uses and adds to a neighborhood's connectivity.
- UD-C.1 "In villages and transit corridors identified in community plans, provide a mix of uses that create vibrant, active places in villages.
- a. Encourage both vertical (stacked) and horizontal (side-by-side) mixed-use development.
  - b. Achieve a mix of housing types, by pursuing innovative designs to meet the needs of a broad range of households.
  - c. Encourage placement of active uses, such as retailers, restaurants, cultural facilities and amenities, and other various services, on the ground floor of buildings in areas where the greatest levels of pedestrian activity are sought.
  - d. Encourage the provision of approximately ten percent of a project's net site area as public space, with adjustments for smaller (less than ten acres) or constrained sites. Public space may be provided in the form of plazas, greens, gardens, pocket parks, amphitheaters, community meeting rooms, public facilities and services, and social services (see also UD-C.5 and UD-E.1).
    1. When public space is provided in the form of public parks in accordance with Recreation Element, Policy RE-A.9, and the public park space may be used to meet population-based park requirements.
    2. Where multiple property owners are involved in a village development, develop incentives or other mechanisms to help provide well-located public spaces.
  - e. Utilize existing or create new Land Development Code zone packages or other regulations as needed for mixed-use development.
    1. Provide standards that address the particular design issues related to mixed-use projects, such as parking, noise attenuation and security measures, and minimize negative impacts on the community.
    2. Provide standards that address bulk, mass, articulation, height, and transition issues such as the interface with surrounding or adjacent development and uses, and minimize negative impacts on the community.
  - f. Encourage location of mixed-use projects in transition areas and areas where small-scale commercial uses can fit into a residential neighborhood context."

- UD-C.4 Create pedestrian-friendly village centers (see also Mobility Element, Sections A and C)
- a. Respect pedestrian-orientation by creating entries directly to the street and active uses at street level.
  - b. Design or redesign buildings to include pedestrian-friendly entrances, outdoor dining areas, plazas, transparent windows, public art, and a variety of other elements to encourage pedestrian activity and interest at the ground floor level.
  - c. Orient buildings in village centers to commercial local streets, or to internal project drives that are designed to function like a public street, in order to create a pedestrian oriented shopping experience, including provision of on-street parking.
  - d. Provide pathways that offer direct connections from the street to building entrances.
  - e. Break up the exterior facades of large retail establishment structures into distinct building masses distinguished by offsetting planes, rooflines and overhangs or other means.
  - f. Where feasible, use small buildings in key locations to create a human scale environment in large retail centers. Incorporate separate individual main entrances directly leading to the outside from individual stores.
- UD-C.6 Design project circulation systems for walkability.
- a. Extend existing street grid patterns into development within existing fine-grained neighborhoods.
  - b. Design a grid or modified-grid internal project street system, with sidewalks and curbs, as the organizing framework for development in village centers.
  - c. Diagonal or “on-street” parallel parking may be appropriate along driveways in order to contribute to a “main street” appearance.
  - d. Provide pedestrian shortcuts through the developments to connect destinations where the existing street system has long blocks or circuitous street patterns.
  - e. Use pedestrian amenities, such as curb extensions and textured paving, to delineate key pedestrian crossings.
  - f. Design new connections, and remove any barriers to pedestrian and bicycle circulation in order to enable people to walk or bike, rather than drive, to neighboring destinations (see also Mobility Element, Sections A and F).
  - g. Lay out streets to take advantage of and maximize vistas into public view sheds.
  - h. Share and manage commercial, residential, and public parking facilities where possible to manage parking for greater efficiency (see also Mobility Element, Section G).

- i. Incorporate design features that facilitate transit service along existing or proposed routes, such as bus pullout areas, covered transit stops, and multi-modal pathways through projects to transit stops.
- UD-C.7 Enhance the public streetscape for greater walkability and neighborhood aesthetics (see also UD-A.10 and Section F.).
- a. Preserve and enhance existing main streets.
  - b. Establish build-to lines, or maximum permitted setbacks on designated streets.
  - c. Design or redesign buildings to include architecturally interesting elements, pedestrian friendly entrances, outdoor dining areas, transparent windows, or other means that emphasize human-scaled design features at the ground floor level.
  - d. Implement pedestrian facilities and amenities in the public right-of-way including wider sidewalks, street trees, pedestrian-scaled lighting and signs, landscape, and street furniture.
  - e. Relate the ground floor of buildings to the street in a manner that adds to the pedestrian experience while providing an appropriate level of privacy and security
  - f. Design or redesign the primary entrances of buildings to open onto the public street.

### **Open Space and Landform Preservation**

- CE-B.1 Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.
- a. Utilize Environmental Growth Funds and pursue additional funding for the acquisition and management of MHPA and other important community open space lands. Support the preservation of rural lands and open spaces throughout the region.
  - c. Protect urban canyons and other important community open spaces including those that have been designated in community plans for the many benefits they offer locally, and regionally as part of a collective citywide open space system (see also Recreation Element, Sections C and F; Urban Design Element, Section A).
  - d. Minimize or avoid impacts to canyons and other environmentally sensitive lands, by relocating sewer infrastructure out of these areas where possible, minimizing construction of new sewer access roads into these areas, and redirecting of sewage discharge away from canyons and other environmentally sensitive lands.
  - e. Encourage the removal of invasive plant species and the planting of native plants near open space preserves.

- f. Pursue formal dedication of existing and future open space areas throughout the City, especially in core biological resource areas of the City's adopted MSCP Subarea Plan.
- g. Require sensitive design, construction, relocation, and maintenance of trails to optimize public access and resource conservation.

### ***Environmentally Sensitive Lands (ESLs) Regulations***

Aside from policies in the General Plan which address topography and sensitive development, the City relies on ESL regulations to identify environmental resources at a site specific level. The City's ESL regulations help protect, preserve, and restore lands containing steep hillsides, sensitive biological resources, coastal beaches, sensitive coastal bluffs, or Special Flood Hazard Areas. The ESL regulations provide supplemental development regulations to the underlying zone to assure that development occurs in a manner that protects the natural and topographical character of these areas. The ESL regulations address permit requirements for development that would affect wetlands and State- and federally-listed species habitat, buffer requirements for wetlands within and outside of the Coastal Overlay Zone, development in the Multi-Habitat Planning Area (MHPA) which delineates 52,727 acres of core biological resource areas, and corridors targeted for conservation.

### ***Proposition D***

In 1972, voters approved Proposition D, which restricts the building height in areas generally west of I-5 to 30 feet. Prior to the adoption of Proposition D, multiple dwelling unit developments in San Diego were built to accommodate a range of densities at varying heights. Since the adoption of Proposition D, the bulk and scale of buildings has become more uniform as property owners seek to maximize development potential within the 30-foot height limit.

## **B.4 Impacts and Mitigation Measures**

### **Significance Criteria**

According to the City of San Diego's CEQA Significance Determination Thresholds, a significant impact with regard to visual effects and neighborhood character could occur if implementation of the CAP results in the following:

- A substantial obstruction of any vista or scenic view from a public viewing area as identified in the community plan;
- The creation of a negative aesthetic site or project;
- Project bulk, scale, materials, or style would be incompatible with surrounding development;
- Substantial alteration to the existing or planned character of the area, such as could occur with the construction of a subdivision in a previously undeveloped area;

- The loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan;
- Substantial change in the existing landform; or
- Substantial light or glare which would adversely affect daytime or nighttime view in the area.

## Impact Analysis

As indicated in Table 2-5 in Chapter 2, Project Description, the proposed CAP actions that could have an impact on visual resources and neighborhood character include the following:

- **Action 2.1 Community Choice Aggregation Program or Similar Program.** Supporting measures and steps that support implementation of this action could result in installation of small scale and large scale renewable energy generation, transmission, and storage systems. These could affect scenic views, result in new sources of light or glare, or could have bulk and scale that would alter or be incompatible with existing neighborhood character.
- **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.** These actions would facilitate the implementation of the City of Villages strategy and the shift to greater emphasis on mass transit and other modes of transportation. These actions could therefore result in new construction and other physical changes 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.
- **Action 3.2 Implement the City's Pedestrian Master Plan in Transit Priority Areas; Action 3.3 Implement the City's Bicycle Master Plan; and Action 3.5 Implement a Roundabouts Master Plan.** These actions would make generally minor changes to improve or add pedestrian and bicycle facilities, primarily in and around the TPAs, and would result in the installation of up to 24 roundabouts to facilitate traffic flow. These changes could alter or block scenic views and vistas, and could be incompatible with existing neighborhood character.
- **Action 5.1 Urban Tree Planting Program.** Street and landscaping trees have the potential to alter or block scenic views and vistas, and to alter neighborhood character.

These potential impacts are examined in detail below. The potential for proposed CAP actions to change the appearance of historical structures is considered in Section 3.E, Historical Resources.

### *Issue 1: 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?*

Several of the CAP strategies include actions that when implemented will result in physical changes to the environment. Some of these changes may have the potential for adverse effects on the visual quality of the area in which they are situated, and in particular, may result in alteration or obstruction of scenic views from public viewing areas, vistas, or open spaces.

Action 2.1 would involve implementation of a community choice aggregation program or other renewable energy program that would likely result in installation of both small scale and large

scale renewable energy facilities. Small scale facilities, such as rooftop photovoltaic panels, generally do not involve construction that substantially changes roof lines or adds massive or tall new features that would have the potential to substantially alter or obstruct views. Therefore, visual impacts of small scale renewable energy systems, implemented as an indirect consequence of adoption of the CAP and implementation of Action 2.1, would not be expected to result in a significant impact to scenic views. Furthermore, pursuant to Senate Bill (SB) 226, CEQA now includes a statutory exemption (Section 21080.35) that exempts solar projects installed on the roof of an existing building or parking lot. Therefore, projects of this kind are not required to undergo CEQA review.

Large scale renewable energy projects, such as solar and wind farms, could involve new, large or extensive facilities that could alter or block public views, within and outside the City. This could occur if, for example, a wind farm introduced a new, incompatible visual element to a scenic view from a public view point, vista, or open space. Depending on the affected vista and the degree of change, this could cause a significant impact. For facilities located outside of the City, the jurisdiction with land use authority would likely be the lead agency for environmental review pursuant to CEQA.

Proposed CAP Action 3.2: Implement the City's Pedestrian Master Plan in Transit Priority Areas, Action 3.3 Implement the City's Bicycle Master Plan, and Action 3.5 Implement a Roundabouts Master Plan involve generally minor changes to existing streetscapes. In general these improvements are low-lying, and do not involve construction of massive or tall structures. While these improvements may alter the visual quality of a neighborhood, these alterations would not generally result in a degradation of visual quality. Neither would these improvements have the potential to block or alter scenic views. Implementation of proposed CAP Actions 3.2, 3.3, and 3.5 would therefore be less than significant.

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 are intended to facilitate implementation of major changes to the urban landscape already planned for in the General Plan, Sustainable Communities Strategy, and other planning documents. These changes would result in the development of more dense, built-up, and transit and alternative transportation-oriented development, particularly within the TPAs. More detailed, neighborhood-specific planning is occurring through updating of the Community Plans and may involve changes to land use designation and zoning. These changes may allow taller or more massive buildings, reduced set-backs, and altered streetscapes, all of which could introduce new elements to the urban landscape that could alter or block existing scenic views from public viewpoints, vistas, and open space, or that could adversely affect existing visual resources.

The General Plan and community plans contain numerous policies intended to protect scenic views and visual resources, including identification of scenic vantage points. The General Plan also provides design objectives to minimize visual impacts and screen new development from open space areas.

The Final Program Environmental Impact Report for the City's 2008 General Plan update (General Plan PEIR) notes that, while the General Plan policies are designed to minimize impacts to public views, there is no guarantee that all future implementation actions and development projects will adequately implement General Plan policies. As a result, in areas where public views of scenic resources exist, direct impacts could occur. The General Plan PEIR further notes that any development that is incompatible in shape, form, or intensity such that public views are impacted, will be analyzed and addressed in project-specific environmental reviews pursuant to CEQA, and that identification of appropriate project-level mitigation measures would be determined at that time. The General Plan PEIR states that General Plan policies and future compliance with established development standards would serve to reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. However, because the degree of impact and applicability, feasibility, and success of these measures could not be accurately predicted for each specific future project, the program level impacts related to blocked public views were considered significant and unavoidable. The CAP would facilitate implementation of the City of Villages strategy, which could result in potentially significant impacts as set forth in the General Plan PEIR. Because the potential for such impacts has already been identified in the General Plan PEIR, these impacts are not considered a consequence of CAP adoption and implementation.

CAP Action 5.1 Urban Tree Planting Program is part of CAP Strategy 5: Climate Resiliency. This strategy has the goal of increasing urban tree canopy coverage, specifically to achieve 15 percent urban tree canopy coverage by 2020 and 35 percent by 2035. Implementation of this action would result in extensive planting of many trees throughout the City. While trees themselves add aesthetic value, and selection of appropriate species would not be expected to conflict with or detract from existing visual quality, trees may, as they grow, have the potential to block or alter scenic views. By adhering to policies contained in the General Plan, community plans, and Urban Forest Management Plan (currently in draft form), the City would ensure that implementation of Action 5.1 would not adversely affect public views. An example of a policy for the plans would be limiting or disallowing the planting of tall trees in the scenic corridors identified in Table 3.B-1. Furthermore, trees that grow to the point that they do obstruct scenic views can be pruned, topped, or removed, which would mitigate the impact. In sum, while there is some potential for CAP Action 5.1 to result in adverse impacts to scenic views, good management of the urban tree planting program, including selection of planting locations and species, and good tree care practices, would ensure that this impact would be less than significant.

### **Significance of Impact**

As described above, most of the proposed CAP actions do not have the potential to alter or block scenic views. 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 a significant impact to visual resources.



### **Mitigation Framework**

Implementation of Mitigation Measure LU-1 (see Section 3.A, Land Use) would 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 would not result in conflicts with adjacent land uses.

### **Significance after Mitigation**

With implementation of Mitigation Measure LU-1, most potentially significant impacts to scenic views and visual quality from siting of most large-scale renewable energy facilities would be avoided. However, because the degree of impact and applicability, feasibility, and success of Mitigation Measure LU-1 cannot be accurately predicted for visual quality and scenic views for each specific project at this time, the program-level impact to visual effects and neighborhood character is considered significant and unavoidable.

### ***Issue 2: 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?***

Issue 2 examines the potential for CAP actions to result in changes to the physical environment that would be fundamentally incompatible with the character of the surrounding community. In particular, Issue 2 explores whether CAP actions would result in construction of new developments or facilities, or alterations to existing structures, that use materials, styles, or designs, or that involve massing or materials that would be visually incompatible with existing neighborhood character. Issue 1 already examined the potential for CAP actions to affect the visual quality of the area, with particular reference to the potential to block or alter scenic views.

Action 2.1 would involve implementation of a community choice aggregation program or other renewable energy program that would likely result in installation of both small scale and large scale renewable energy facilities. Small scale facilities may introduce a new visual element to a neighborhood, including solar roof panels, but solar panels are already becoming common, and do not represent a major alteration in building design or character. Therefore, these small-scale facilities would not be expected to be substantially incompatible with the existing character of the surrounding area.

Large scale renewable energy projects, such as solar and wind farms, could involve new, large or extensive facilities with distinct visual characteristics. These facilities have an essentially industrial visual quality. Wind farms, in particular, involve tall, moving structures that are visually prominent. If located in or adjacent to a residential or mixed use neighborhood, large scale facilities may appear incompatible with the surrounding urban environment. Depending on the affected vista and the degree of change, this could cause a significant impact.

Proposed CAP Action 3.2: Implement the City's Pedestrian Master Plan in Transit Priority Areas, Action 3.3 Implement the City's Bicycle Master Plan, and Action 3.5 Implement a Roundabouts Master Plan involve generally minor changes to existing streetscapes, such as changes in signage, street marking, addition of bicycle lanes and paths, and wider sidewalks. Roundabouts add a new

element to the streetscape, but they are not tall or massive, and can be designed and landscaped to create a compatible and pleasing visual element. In summary, while changes related to proposed CAP actions 3.2, 3.3, and 3.5 may introduce new or altered visual elements to an existing neighborhood, they are generally minor changes. If their design follows design guidelines contained in the General Plan and community plans, they would not be expected to result in a substantial incompatibility with surrounding areas, and their impact would therefore be less than significant.

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. These developments have the potential to substantially alter the existing urban environment, and create a new, different urban landscape that may be out of keeping with the scale of the existing landscape, and their design may be different from the surrounding neighborhood.

The General Plan PEIR notes that, as changes occur in established neighborhoods, the applicable policies in the General Plan related to neighborhood character will provide design guidelines to improve the transition between new and old structures. In addition, the General Plan influences the implementation of community plans as it establishes goals and policies for the pattern and scale of development and the character of the built environment. Individual community plans are intended to provide additional recommendations for how new development will occur. It is intended that the urban design policies of the General Plan be further supplemented with site-specific community plan recommendations. As community plans are updated, community and neighborhood character will be addressed more specifically.

While the policies, guidelines, and community plan update process are designed to minimize future impacts to community character, implementation of the City of Villages strategy, as facilitated by CAP Actions 3.1 and 3.6, may result in significant impacts associated with substantially altering the existing character of the City's neighborhoods. The General Plan PEIR concludes that there is no guarantee that all future implementation actions and development projects will adequately implement General Plan policies. The CAP does not include measures that would mitigate the potential for impacts of this kind. Therefore, the program-level impact related to community character identified in the General Plan PEIR would remain significant. Since, however, the potential for such impacts has already been identified in the General Plan PEIR, these impacts are not considered a consequence of CAP adoption and implementation.

CAP Action 5.1 Urban Tree Planting would result in extensive planting of many trees throughout the City. Trees add aesthetic value to urban landscapes, and selection of appropriate species would not be expected to conflict with or detract from existing visual quality, or to introduce incompatible visual elements into existing landscapes, and this impact would be less than significant.

### **Significance of Impact**

As described above, 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.

### **Mitigation Framework**

Implementation of Mitigation Measure LU-1 (see Section 3.A, Land Use) would 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 would not result in conflicts with adjacent land uses.

### **Significance after Mitigation**

With implementation of Mitigation Measure LU-1, most potentially significant visual quality and neighborhood character impacts from siting of most large-scale renewable energy facilities would be avoided. However, because the degree of impact and applicability, feasibility, and success of Mitigation Measure LU-1 cannot be accurately predicted for visual compatibility with existing neighborhoods for each specific project at this time, the program-level impact to visual effects and neighborhood character is considered significant and unavoidable.

### ***Issue 3: Would implementation of the CAP create substantial light or glare which would adversely affect daytime or nighttime views in the area?***

New or remodeled construction associated with implementation of several of the proposed CAP Actions would have the potential to create new sources of nighttime light or daytime glare. These include renewable energy facilities associated with Action 2.1 Community Choice Aggregation Program, and the actions intended to facilitate implementation of the City of Villages strategy, i.e., 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.

Other CAP Actions considered for visual and neighborhood character impacts, including Action 3.2: Implement the City's Pedestrian Master Plan in Transit Priority Areas, Action 3.3 Implement the City's Bicycle Master Plan, Action 3.5 Implement a Roundabouts Master Plan, and Action 5.1 Urban Tree Planting Program, would not create extensive new reflective surfaces or nighttime lighting, and would therefore not have an impact related to light or glare.

Action 2.1 would result in widespread installation of small scale, distributed energy generation facilities, such as rooftop solar. Solar panels are designed to absorb light, not reflect it, and therefore are not a source of glare. Rooftop solar installations are not lit, and so would not create a new source of nighttime artificial light. Larger renewable energy facilities may also be developed within the City with implementation of Action 2.1. Like small-scale rooftop systems, solar panels in large solar farms are not highly reflective. Other types of facilities, such as wind

farms, transmission facilities, and storage facilities, generally use materials and coatings that are not highly reflective. Therefore, these larger facilities would not be expected to create a substantial new source of glare. Large renewable energy facilities may be lit at night, primarily for security and safety reasons. Lighting is typically minimal. Adherence to City design standards, such as use of down-cast landscape lighting, would minimize the potential for substantial new sources of artificial nighttime lighting. Therefore, Action 2.1 is not expected to result in a significant impact related to light and glare.

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 facilitate extensive new in-fill development and redevelopment within the TPAs, as discussed in the General Plan EIR. Adherence to General Plan and community plan design standards is anticipated to minimize impacts related to glare from reflective surfaces and new sources of nighttime lighting. Environmental review of individual projects requiring discretionary approval would provide additional opportunity to identify and mitigate site-specific and development-specific impacts of this kind. Mitigation measures, such as lighting design and use of non-reflective materials and architectural coatings, are generally effective at reducing such impacts to less than significant. Therefore, there is little potential for CAP Actions 3.1 and 3.6 to result in a substantial new source of light or glare, and the impact is less than significant.

#### **Significance of Impact**

As discussed above, implementation of the CAP would not be expected to result in a significant new source of light or glare. The impact is therefore less than significant.

#### **Mitigation Framework**

No mitigation is required.

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## C. Air Quality

### C.1 Introduction

This section analyzes potential air quality impacts that could result from implementation of the City of San Diego (City) Climate Action Plan (CAP).

### C.2 Environmental Setting

#### Physical Setting

The San Diego Air Basin (SDAB) lies in the southwest corner of California and comprises the entire San Diego region. However, population and emissions are concentrated mainly in the western portion of the county. The air basin covers 4,200 square miles, includes about eight percent of the state's population, and produces about five percent of the state's criteria pollutant emissions (CARB, 2013a). The City of San Diego covers approximately 330 square miles, or eight percent, of the SDAB.

Air quality in the SDAB is impacted not only by local emissions, but also by pollutants transported from other areas, in particular, ozone and ozone precursor emissions transported from the South Coast Air Basin and the Republic of Mexico. Although the impact of transport is particularly important on days with high ozone concentrations, transported pollutants and emissions cannot be blamed entirely for the ozone problem in the San Diego area. Studies show that emissions from the SDAB are sufficient, on their own, to cause ozone violations (SDAPCD, 2007).

#### Topography and Climate

The topography in the San Diego region varies greatly, from beaches on the west to mountains and desert on the east, defined by mesa tops intersected by canyon areas. The topography in the San Diego region, along with local meteorology, influences the dispersal and movement of pollutants in the basin. The mountains to the east prohibit dispersal of pollutants beyond them and help trap the pollutants in inversion layers.

The weather of the San Diego region is influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average temperature ranges from the mid-40s to the high 90s. Most of the county's precipitation falls from November to April, with infrequent (approximately ten percent) precipitation during the summer. The average seasonal precipitation along the coast is approximately ten inches; the amount increases with elevation as moist air is lifted over the mountains.

The interaction of ocean, land, and the Pacific High Pressure Zone maintains clear skies for much of the year and drives the prevailing winds. Local terrain is often the dominant factor inland, and winds in inland mountainous areas tend to blow through the valleys during the day and down the hills and valleys at night.

In conjunction with the two characteristic onshore/offshore wind patterns, there are two types of temperature inversions (reversals of the normal decrease of temperature with height) which occur within the region that affect atmospheric dispersive capability and that act to degrade local air quality. In the summer, an inversion at about 1,100 to 2,500 feet is formed over the entire coastal plain when the warm air mass over land is undercut by a shallow layer of cool marine air flowing offshore. The prevailing sunny days in this region further exacerbate the smog problem by inducing additional adverse photochemical reactions. During the winter, a nightly shallow inversion layer (usually at about 800 feet) forms between the cooled air at the ground and the warmer air above, which can trap vehicular pollutants. The days of highest CO concentrations occur during the winter months.

The predominant onshore/offshore wind pattern is sometimes interrupted by so-called Santa Ana conditions, when high pressure over the Nevada-Utah area overcomes the prevailing westerly winds, sending strong, steady, hot and dry winds from the east over the mountains and out to sea. Strong Santa Ana winds tend to blow pollutants out over the ocean, producing clear days. However, at the onset or breakdown of these conditions or if the Santa Ana is weak, prevailing northwesterly winds reassert themselves and send a cloud of contamination from the Los Angeles Basin ashore in the SDAB.

## **Existing Air Quality**

### ***Regional Air Quality***

As in other parts of California, overall air quality in the SDAB has improved, despite high growth rates, in part due to the benefits of cleaner technologies. In 2002, motor vehicles and other mobile sources were determined to emit 76 percent of the harmful pollutants that degrade the air quality of the San Diego region, and industrial sources emitted 14 percent (SDAQMD, 2002). As of 2013 San Diego County's air quality is the best it has been since the mid 1950's when air pollutant measuring began. Even so, pollutants from mobile sources still make up approximately 75 percent of the total pollutant emissions within the region (SDAQMD, 2013a).

Significant progress has been realized in the region's air quality since the early 1970s when SANDAG and the San Diego Air Pollution Control District (SDAPCD) began working together to reduce regional emissions. SANDAG is responsible for developing a "Transportation Control Measures (TCM) Plan" to help achieve air quality objectives for the region, which is developed with input from the City of San Diego. The SDAPCD adopts the TCM Plan as part of the RAQS, which is updated on a triennial basis and outlines measures for achieving state and national air quality standards. The SDAPCD is also responsible for stationary source tactics to reduce air pollution resulting from industry.

### ***Criteria Air Pollutants***

The Federal Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (U.S. EPA) to identify National Ambient Air Quality Standards (NAAQS), or (national standards) to protect public health and welfare. National standards have been established for ozone, carbon monoxide,

nitrogen dioxide, sulfur dioxide, respirable particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>)<sup>1</sup>, and lead. These pollutants are called “criteria” air pollutants because standards have been established for each of them to meet specific public health and welfare criteria set forth in the CAA. California has adopted more stringent ambient air quality standards for the criteria air pollutants (referred to as State Ambient Air Quality Standards, or state standards) and has adopted air quality standards for some pollutants for which there is no corresponding national standard. The national and state standards for criteria pollutants are provided above in the Regulatory Setting section.

Emissions of NO<sub>x</sub> and ROG in the SDAB have been following statewide trends for each pollutant since 2000. These trends are largely due to motor vehicle controls and reductions in evaporative emissions. Mobile sources (both on-road and other) are by far the largest contributors to NO<sub>x</sub>, and ROG in the SDAB. The majority of the PM<sub>10</sub> emissions are from area-wide sources (CARB, 2013a).

CARB and the SDAPCD collect ambient air quality data locally through a network of air monitoring stations. These data are summarized annually and are published in CARB’s California Air Quality Data Summaries. Active monitoring stations in San Diego County are located at 11 stations, shown on **Figure 3.C-1**. Air quality monitoring data for the five stations within the City of San Diego is shown in **Table 3.C-1**, which identifies the most recent available data for federal and state ambient air quality standards for the relevant air pollutants, along with the ambient pollutant concentrations of the three air pollutants that were measured at these stations and for which the SDAB remains “nonattainment” - ozone, PM<sub>10</sub>, and PM<sub>2.5</sub>.

While the data gathered at these monitoring stations may not necessarily reflect the unique air quality environment of all areas of the city and county, nor the proximity of site-specific stationary and street sources, they do present the nearest available benchmark and provide the reader with a reference point as to the pollutants of greatest concern in the region and the degree to which the area is out of attainment with specific air quality standards. In summary, the SDAB is non-attainment for the ozone (state and federal), PM<sub>10</sub> (state), and PM<sub>2.5</sub> (state and federal) standards.

### Ozone

Short-term exposure to ozone can irritate the eyes and cause constriction of the airways. Besides causing shortness of breath, ozone can aggravate existing respiratory diseases such as asthma, bronchitis, and emphysema. Ozone, the main component of photochemical smog, is primarily a summer and fall pollution problem. Ozone is not emitted directly into the air but is formed through a complex series of chemical reactions involving other compounds that are directly emitted. These directly emitted pollutants (also known as ozone precursors) include ROG and NO<sub>x</sub>. The time period required for ozone formation allows the reacting compounds to spread over a large area, producing a regional pollution problem. Ozone problems are the cumulative result of regional development patterns rather than the result of a few significant emission sources. Once

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<sup>1</sup> PM<sub>10</sub> and PM<sub>2.5</sub> consist of particulate matter that is ten microns or less in diameter and 2.5 microns or less in diameter, respectively (a micron is one-millionth of a meter).



formed, ozone remains in the atmosphere for one or two days. Ozone is then eliminated through a chemical reaction with plants (reacts with chemicals on the leaves of plants); rainout (attaches to water droplets as they fall to earth); and, washout (absorbed by water molecules in clouds and later falls to earth with rain).

On-road motor vehicle emissions account for approximately 45 percent of smog (ROG + NO<sub>x</sub>) in the San Diego region as of 2010 (CARB, 2013a). The NO<sub>x</sub> and ROG emissions have been decreasing overall since 2000, mostly due to decreased emissions from motor vehicles, brought about by stricter motor vehicle emission standards. Over the last 35 years, stationary and area-wide source emissions of ROG have remained mostly unchanged due to stricter standards offsetting emissions from industry and population growth (CARB, 2013a).

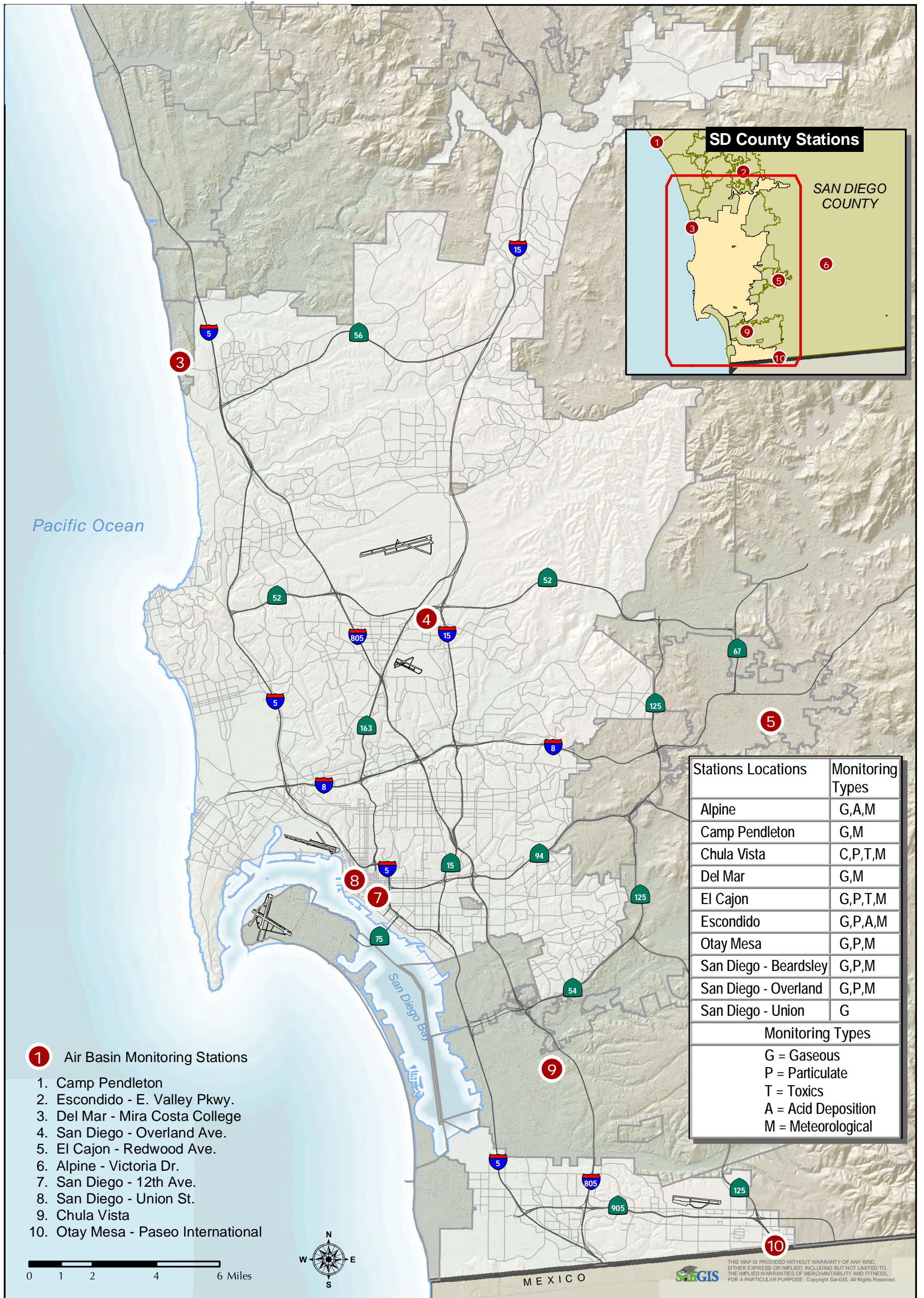
The federal one-hour ozone standard is attained when each monitoring site in the region has no more than three days in a three-year period within a maximum hourly average concentration exceeding the standard. The standard has now been attained and the SDAB has been redesignated as an attainment area by United States Environmental Protection Agency (U.S. EPA). San Diego still has not met the more restrictive state one-hour ozone standard, or the federal eight-hour ozone standard. In 2005, the U.S. EPA replaced the one-hour federal ozone standard with a more protective eight-hour standard to address the adverse health effects of prolonged exposure.

**Table 3.C-1** shows SDAB exceedances for monitoring stations within the City of San Diego from 2009 to 2013. The Del Mar-Mira Costa College station recorded exceedances of the eight-hour state standard on three days in 2009 and at the San Diego-Overland Avenue station in 2009, 2010, and 2011. All other stations recorded exceedances of two times or less, with several years reporting no exceedance of either station or federal one or eight hour standards.

### **Carbon Monoxide**

Ambient carbon monoxide concentrations normally are considered a local effect and typically correspond closely to the spatial and temporal distributions of vehicular traffic. Wind speed and atmospheric mixing also influence carbon monoxide concentrations. Under inversion conditions, carbon monoxide concentrations may be distributed more uniformly over an area that may extend some distance from vehicular sources. When inhaled at high concentrations, carbon monoxide combines with hemoglobin in the blood and reduces the oxygen-carrying capacity of the blood. This results in reduced oxygen reaching the brain, heart, and other body tissues. This condition is especially critical for people with cardiovascular diseases, chronic lung disease, or anemia, as well as for fetuses.

Improvements from the transportation sector, primarily resulting from advances in technology such as emissions control systems, have resulted in major reductions in CO emissions in the SDAB, following the statewide trend, of declining from 3,338 tons per day in 1975 to 953 tons per day in 2005 and an estimated 558 tons per day in 2020 (CARB, 2009a). The SDAB was reclassified as an attainment area for CO in 2004 and currently maintains its attainment status (SDAPCD, 2013a). The U.S. EPA approved the CO Maintenance Plan in 1998. As of 2011, the national CO standard had been attained statewide.



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**TABLE 3.C-1  
SAN DIEGO AIR BASIN - SUMMARY OF AIR QUALITY MONITORING DATA (2009–2013)**

Station	Applicable Standard	Number of Days Standards Were Exceeded and Maximum Concentrations Measured <sup>a</sup>				
		2009	2010	2011	2012	2013
<b>Del Mar-Mira Costa College</b>						
<b>Ozone</b>						
- Days 1-hour State Std. Exceeded	>0.09 ppm <sup>b</sup>	1	0	0	0	0
- Max. 1-hour Conc. (ppm)		<b>0.097</b>	0.085	0.091	0.088	0.076
- Days 8-hour National Std. Exceeded	>0.075 ppm <sup>c</sup>	1	0	0	2	0
- Days 8-hour State Std. Exceeded	>0.07 ppm <sup>b</sup>	3	2	1	2	0
- Max. 8-hour Conc. (ppm)		<b>0.084</b>	<b>0.072</b>	<b>0.075</b>	<b>0.079</b>	0.070
<b>Otay Mesa-Paseo International</b>						
<b>Ozone</b>						
- Days 1-hour State Std. Exceeded	>0.09 ppm <sup>b</sup>	1	0	1	0	0
- Max. 1-hour Conc. (ppm)		<b>0.098</b>	0.076	<b>0.095</b>	0.081	0.073
- Days 8-hour National Std. Exceeded	>0.075 ppm <sup>c</sup>	0	0	1	0	0
- Days 8-hour State Std. Exceeded	>0.07 ppm <sup>b</sup>	0	0	1	0	0
- Max. 8-hour Conc. (ppm)		0.068	0.068	<b>0.076</b>	0.062	0.063
<b>PM<sub>10</sub></b>						
- Estimated Days Over 24-hour National Std. <sup>d</sup>	>150 µg/m <sup>3c</sup>	0	0	0	-	-
- Estimated Days Over 24-hour State Std. <sup>d</sup>	>50 µg/m <sup>3b</sup>	146.4	136.0	138.5	-	-
- Max. 24-hour Conc. National/State (µg/m <sup>3</sup> )		126.0/ <b>123.0</b>	108.0/ <b>108.0</b>	125.0/ <b>126.0</b>	126.0/ <b>126.0</b>	-
- State Annual Average (µg/m <sup>3</sup> )	>20 µg/m <sup>3b</sup>	<b>53.0</b>	<b>47.0</b>	<b>46.2</b>	-	-
<b>Carbon Monoxide</b>						
- Max. 1-hour Conc. (ppm) National/State	>35 ppm/ >20 ppm	4.6	3.1	-	-	-
- Max. 8-hour Conc. (ppm) National and State	>9 ppm	3.1	2.2	-	-	-
<b>Nitrogen Dioxide</b>						
- Max. 1-hour Conc. (ppm) National/State	>10 ppm/ >0.18 ppm	0.091	0.091	0.10	0.077	0.091
- Annual Average (ppm) National/State	>0.053ppm/ >0.03ppm	0.020	0.020	0.020	0.020	0.019
<b>Sulfur Dioxide</b>						
- Max. 1-hour Conc. (ppm) National/State	>0.25 ppm/ >0.75 ppm	0.029	0.027	0.018	-	-
- Max. 24-hour Conc. (ppm) National/State	>0.14 ppm/ >0.04 ppm	0.008	0.007	0.006	-	-
- Annual Average (ppm)	>0.030 ppm	0.003	0.001	0.002	-	-
<b>San Diego-1110 Beardsley Street</b>						
<b>Ozone</b>						
- Days 1-hour State Std. Exceeded	>0.09 ppm <sup>b</sup>	0	0	0	0	0
- Max. 1-hour Conc. (ppm)		0.085	0.078	0.082	0.071	0.063
- Days 8-hour National Std. Exceeded	>0.075 ppm <sup>c</sup>	0	0	0	0	0
- Days 8-hour State Std. Exceeded	>0.07 ppm <sup>b</sup>	0	0	0	0	0
- Max. 8-hour Conc. (ppm)		0.063	0.066	0.061	0.065	0.061

**TABLE 3.C-1 (Continued)**  
**SAN DIEGO AIR BASIN - SUMMARY OF AIR QUALITY MONITORING DATA (2009–2013)**

Station	Applicable Standard	Number of Days Standards Were Exceeded and Maximum Concentrations Measured <sup>a</sup>				
		2009	2010	2011	2012	2013
<b>San Diego-1110 Beardsley Street (cont.)</b>						
<b><i>PM<sub>10</sub></i></b>						
- Estimated Days Over 24-hour National Std. <sup>d</sup>	>150 µg/m <sup>3c</sup>	0	0	0	0	0
- Estimated Days Over 24-hour State Std. <sup>d</sup>	>50 µg/m <sup>3b</sup>	18.2	0	0	0	6
- Max. 24-hour Conc. National/State (µg/m <sup>3</sup> )		59.0/ <b>60.0</b>	40.0/40.0	48.0/49.0	45.0/47.0	90.0/ <b>92.0</b>
- State Annual Average (µg/m <sup>3</sup> )	>20 µg/m <sup>3b</sup>	<b>29.4</b>	<b>23.4</b>	<b>24.0</b>	<b>22.2</b>	<b>25.4</b>
<b><i>PM<sub>2.5</sub></i></b>						
- Estimated Days Over 24-hour National Std. <sup>d</sup>	>35 µg/m <sup>3c</sup>	3.4	0	0	1.0	1.1
- Max. 24-hour Conc. (µg/m <sup>3</sup> )		<b>52.1</b>	29.7	34.7	<b>39.8</b>	<b>37.4</b>
- Annual Average (µg/m <sup>3</sup> )	>12 µg/m <sup>3b</sup>	11.8	10.4	10.9	11.1	10.4
<b><i>Carbon Monoxide</i></b>						
- Max. 1-hour Conc. (ppm) National/State	>35 ppm/ >20 ppm	4.0	2.8	2.8	2.6	3.0
- Max. 8-hour Conc. (ppm) National and State	>9 ppm	2.8	2.2	2.4	1.9	2.1
<b><i>Nitrogen Dioxide</i></b>						
- Max. 1-hour Conc. (ppm) National/State	>10 ppm/ >0.18 ppm	0.078	0.077	0.067	0.065	0.072
- Annual Average (ppm) National/State	>0.053ppm/ >0.03ppm	0.017	0.014	0.014	0.013	0.014
<b><i>Sulfur Dioxide</i></b>						
- Max. 1-hour Conc. (ppm) National/State	>0.25 ppm/ >0.75 ppm	0.021	0.008	0.013	-	-
- Max. 24-hour Conc. (ppm) National/State	>0.14 ppm/ >0.04 ppm	0.005	0.002	0.002	-	-
- Annual Average (ppm)	>0.030 ppm	0.001	0.000	0.001		
<b>San Diego-Kearny Villa Road</b>						
<b><i>Ozone</i></b>						
- Days 1-hour State Std. Exceeded	>0.09 ppm <sup>b</sup>	-	0	0	1	0
- Max. 1-hour Conc. (ppm)		-	0.073	0.093	<b>0.099</b>	0.081
- Days 8-hour National Std. Exceeded	>0.075 ppm <sup>c</sup>	-	0	1	1	0
- Days 8-hour State Std. Exceeded	>0.07 ppm <sup>b</sup>	-	0	2	3	1
- Max. 8-hour Conc. (ppm)		-	0.061	<b>0.084</b>	<b>0.077</b>	<b>0.071</b>
<b><i>PM<sub>10</sub></i></b>						
- Estimated Days Over 24-hour National Std. <sup>d</sup>	>150 µg/m <sup>3c</sup>	-	-	-	-	0
- Estimated Days Over 24-hour State Std. <sup>d</sup>	>50 µg/m <sup>3b</sup>	-	-	-	-	0
- Max. 24-hour Conc. National/State (µg/m <sup>3</sup> )		-	-	-	35.0/35.0	39.0/38.0
- State Annual Average (µg/m <sup>3</sup> )	>20 µg/m <sup>3b</sup>	-	-	-	-	20.0
<b><i>PM<sub>2.5</sub></i></b>						
- Estimated Days Over 24-hour National Std. <sup>d</sup>	>35 µg/m <sup>3c</sup>	-	-	-	-	0
- Max. 24-hour Conc. (µg/m <sup>3</sup> )		-	-	-	20.1	22.0
- Annual Average (µg/m <sup>3</sup> )	>12 µg/m <sup>3b</sup>	-	-	-	22.0	22.0

**TABLE 3.C-1 (Continued)**  
**SAN DIEGO AIR BASIN - SUMMARY OF AIR QUALITY MONITORING DATA (2009–2013)**

Station	Applicable Standard	Number of Days Standards Were Exceeded and Maximum Concentrations Measured <sup>a</sup>				
		2009	2010	2011	2012	2013
<b>San Diego-Kearny Villa Road (cont.)</b>						
<b>Nitrogen Dioxide</b>						
- Max. 1-hour Conc. (ppm) National/State	>10 ppm/ >0.18 ppm	0.060	0.073	0.073	0.057	0.067
- Annual Average (ppm) National/State	>0.053ppm/ >0.03ppm	0.013	0.013	0.012	0.011	0.010
<b>San Diego-Overland Avenue</b>						
<b>Ozone</b>						
- Days 1-hour State Std. Exceeded	>0.09 ppm <sup>b</sup>	2	2	1	0	-
- Max. 1-hour Conc. (ppm)		<b>0.105</b>	<b>0.100</b>	<b>0.097</b>	0.050	-
- Days 8-hour National Std. Exceeded	>0.075 ppm <sup>c</sup>	1	0	1	0	-
- Days 8-hour State Std. Exceeded	>0.07 ppm <sup>b</sup>	3	3	3	0	-
- Max. 8-hour Conc. (ppm)		<b>0.82</b>	<b>0.074</b>	<b>0.087</b>	0.047	-
<b>PM<sub>10</sub></b>						
- Estimated Days Over 24-hour National Std. <sup>d</sup>	>150 µg/m <sup>3</sup> <sup>c</sup>	0	0	0	-	-
- Estimated Days Over 24-hour State Std. <sup>d</sup>	>50 µg/m <sup>3</sup> <sup>b</sup>	0	0	0	-	-
- Max. 24-hour Conc. National/State (µg/m <sup>3</sup> )		50.0/50.0	33.0/32.0	47.0/47.0	22.0/22.0	-
- State Annual Average (µg/m <sup>3</sup> )	>20 µg/m <sup>3</sup> <sup>b</sup>	<b>24.9</b>	18.7	20.3	-	-
<b>PM<sub>2.5</sub></b>						
- Estimated Days Over 24-hour National Std. <sup>d</sup>	>35 µg/m <sup>3</sup> <sup>c</sup>	0	0	0	0	-
- Max. 24-hour Conc. (µg/m <sup>3</sup> )		25.1	18.7	29.9	20.0	-
- Annual Average (µg/m <sup>3</sup> )	>12 µg/m <sup>3</sup> <sup>b</sup>	10.5	8.7	8.9	-	-

## NOTES:

**Bold** values are in excess of applicable standard. "NA" indicates that data is not available.  
 conc. = concentration; ppm = parts per million; ppb=parts per billion;  
 µg/m<sup>3</sup> = micrograms per cubic meter

<sup>a</sup> Number of days exceeded is for all days in a given year, except for particulate matter. PM10 and PM2.5 are monitored every six days.

<sup>b</sup> State standard, not to be exceeded.

<sup>c</sup> Federal standard, not to be exceeded.

<sup>d</sup> Particulate matter sampling schedule of one out of every six days, for a total of approximately 60 samples per year. Estimated days exceeded mathematically estimates how many days concentrations would have been greater than the level of the standard had each day been monitored.

SOURCE: CARB, 2013b. SDAPCD, 2013b.

### **Suspended Particulate Matter (PM<sub>10</sub> and PM<sub>2.5</sub>)**

PM<sub>10</sub> and PM<sub>2.5</sub> represent fractions of particulate matter that can be inhaled into the air passages and the lungs and can cause adverse health effects. Some sources of particulate matter, such as wood burning in fireplaces, demolition, and construction activities, are more local in nature, while others, such as vehicular traffic, have a more regional effect. Very small particles of certain substances (e.g., sulfates and nitrates) can cause lung damage directly, or can contain adsorbed gases (e.g., chlorides or ammonium) that may be injurious to health. Particulates also can damage materials and reduce visibility. Large dust particles (diameter greater than ten microns) settle out rapidly and are easily filtered by human breathing passages. This large dust is of more concern as a soiling nuisance rather than a health hazard. The remaining fraction, PM<sub>10</sub> and PM<sub>2.5</sub>, are a health concern particularly at levels above the federal and state ambient air quality standards. PM<sub>2.5</sub> (including diesel exhaust particles) is thought to have greater effects on health, because these particles are so small and thus are able to penetrate to the deepest parts of the lungs. Scientific studies have suggested links between fine particulate matter and numerous health problems including asthma, bronchitis, acute and chronic respiratory symptoms such as shortness of breath and painful breathing.

Recent studies have shown an association between morbidity and mortality and daily concentrations of particulate matter in the air. Children are more susceptible to the health risks of PM<sub>10</sub> and PM<sub>2.5</sub> because their immune and respiratory systems are still developing.

The concentration of PM<sub>10</sub> recorded at stations within the City of San Diego did not exceed national 24-hour standards at any of the stations. The 1110 Beardsley Street station exceeded the 24-hour state standard on 18.2 days in 2009 and six days in 2013. The Otay Mesa-Paseo International station recorded the highest number of days exceeding the state 24-hour standard at 146.4 days in 2009, 136 days in 2010, and 138.5 days in 2011 (CARB, 2013b).

### **Nitrogen Dioxide (NO<sub>2</sub>)**

NO<sub>2</sub> is a reddish brown gas that is a by-product of combustion processes. Automobiles and industrial operations are the main sources of NO<sub>2</sub>. Aside from its contribution to ozone formation, nitrogen dioxide can increase the risk of acute and chronic respiratory disease and reduce visibility. NO<sub>2</sub> may be visible as a coloring component of a brown cloud on high pollution days, especially in conjunction with high ozone levels. NO<sub>2</sub> emissions in the SDAB follow the statewide trend of declining from 1985 to 2020. Although the maximum one-hour concentrations occasionally exceeded the ambient air quality standards in the 1980s, ambient concentrations are now well below the levels of both the state and national standards and the SDAB is considered in attainment (SDAPCD, 2013a).

### **Sulfur dioxide (SO<sub>2</sub>)**

SO<sub>2</sub> is a combustion product of sulfur or sulfur-containing fuels such as coal and diesel. SO<sub>2</sub> is also a precursor to the formation of atmospheric sulfate, particulate matter and contributes to potential atmospheric sulfuric acid formation that can precipitate downwind as acid rain. The maximum SO<sub>2</sub> concentrations recorded in the county are well below federal and state standards.

Accordingly, the county is in attainment status with both federal and state SO<sub>2</sub> standards. The SDAB has been in attainment for SO<sub>2</sub> for several years (SDAPCD, 2013a). The low level of SO<sub>2</sub> in the basin could be attributed to use of low-sulfur fuels in the region's electrical generators, a primary source of this pollutant in other areas of the country (SDAPCD, 2007).

### **Lead**

Ambient lead concentrations meet both the federal and state standards in the county. Lead has a range of adverse neurotoxin health effects, and was formerly released into the atmosphere primarily via leaded gasoline products. The phase-out of leaded gasoline in California resulted in dramatically reduced levels of atmospheric lead. The SDAB is presently in attainment for lead, and the region no longer monitors for it (SDAPCD, 2013a). As the project would not produce lead, lead is not discussed further in this analysis.

### ***Non-Criteria Air Pollutants***

#### **Toxic Air Contaminants (TACs)**

Non-criteria air pollutants or TACs are airborne substances that are capable of causing short-term (acute) and/or long-term (chronic or carcinogenic, i.e., cancer causing) adverse human health effects. TACs include both organic and inorganic chemical substances. They may be emitted from a variety of common sources including gasoline stations, automobiles, diesel engines, dry cleaners, industrial operations, and painting operations. TACs are regulated differently than criteria air pollutants at both federal and state levels. At the federal level, these airborne substances are referred to as Hazardous Air Pollutants (HAPs). The state list of TACs identifies 243 substances and the federal list of HAPs identifies 189 substances.

CARB identified diesel particulate matter (DPM) as a toxic air contaminant in 1998, primarily based on evidence demonstrating cancer effects in humans. The exhaust from diesel engines includes hundreds of different gaseous and particulate components, many of which are toxic. Mobile sources such as trucks and buses are among the primary sources of diesel emissions, and concentrations of DPM are higher near heavily traveled highways and rail lines with diesel locomotive operations. The cancer risk from diesel particulate matter as determined by the CARB declined from 900 persons in one million in 1990 to 540 persons in one million in 2000 (CARB, 2009a). This calculated cancer risk value from ambient air exposure can be compared against the lifetime probability of being diagnosed with cancer in the United States, from all causes, which is approximately 40 percent, or greater than 400,000 in one million, according to the National Cancer Institute (National Cancer Institute, 2014).

#### **Odorous Emissions**

Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and



is more likely to cause complaints than a familiar one. Known as odor fatigue, a person can become desensitized to almost any odor and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depend on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors. Generally, increasing the distance between the receptor and the odor source will mitigate odor impacts. However, because offensive odors rarely cause any physical harm and no requirements for their control are included in state or national air quality regulations, the SDAPCD has no rules or standards related to odor emissions, other than its nuisance rule (Rule 51).

### ***Sensitive Receptors***

Some individuals are considered to be more sensitive than others to air pollution. Reasons for greater sensitivity can include existing health problems, duration of exposure to air pollutants, or certain peoples' increased susceptibility to pollution-related health problems due to factors such as age.

Land uses such as day care centers, primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive receptors to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality related health problems than the general public. Residential uses are considered sensitive because people in residential areas are often at home for extended periods of time; thus, they can be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

## **C.3 Regulatory Setting**

Regulation of air pollution is achieved through both national and state ambient air quality standards and through emissions limits on individual sources of air pollutants. Local Air Quality Management Districts (AQMDs) and Air Pollution Control Districts (APCDs) are responsible for demonstrating attainment with state air quality standards through the adoption and enforcement of Attainment Plans.

### **Federal**

#### ***Criteria Air Pollutants***

The Federal Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (U.S. EPA) to identify National Ambient Air Quality Standards (NAAQS), or (national standards) to protect public health and welfare. National standards have been established for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, respirable particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>), and lead. These pollutants are called "criteria" air pollutants because standards have been established for each of them to meet specific public health and welfare criteria set forth in the CAA. California has adopted more stringent ambient air quality standards for the criteria air pollutants (referred to as State Ambient Air Quality Standards, or state standards) and has adopted air quality standards for some pollutants for which there is no corresponding national standard. **Table 3.C-2** presents current

**TABLE 3.C-2  
STATE AND NATIONAL CRITERIA AIR POLLUTANT STANDARDS, EFFECTS, AND SOURCES**

Pollutant	Averaging Time	State Standard	National Standard	Pollutant Health and Atmospheric Effects	Major Pollutant Sources
Ozone	1 hour	0.09 ppm	---	High concentrations can directly affect lungs, causing irritation. Long-term exposure may cause damage to lung tissue.	Formed when reactive organic gases (ROG) and nitrogen oxides (NO <sub>x</sub> ) react in the presence of sunlight. Major sources include on-road motor vehicles, solvent evaporation, and commercial / industrial mobile equipment.
	8 hours	0.07 ppm	0.075 ppm		
Carbon Monoxide	1 hour	20 ppm	35 ppm	Classified as a chemical asphyxiant, carbon monoxide interferes with the transfer of fresh oxygen to the blood and deprives sensitive tissues of oxygen.	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm		
Nitrogen Dioxide	1 hour	0.18 ppm	100 ppb	Irritating to eyes and respiratory tract. Colors atmosphere reddish-brown.	Motor vehicles, petroleum refining operations, industrial sources, aircraft, ships, and railroads.
	Annual Avg.	0.030 ppm	0.053 ppm		
Sulfur Dioxide	1 hour	0.25 ppm	75 ppb	Irritates upper respiratory tract; injurious to lung tissue. Can yellow the leaves of plants, destructive to marble, iron, and steel. Limits visibility and reduces sunlight.	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	3 hours	---	0.5 ppm		
	24 hours	0.04 ppm	0.14 ppm		
	Annual Avg.	---	0.030 ppm		
Respirable Particulate Matter (PM10)	24 hours	50 ug/m <sup>3</sup>	150 ug/m <sup>3</sup>	May irritate eyes and respiratory tract, decreases in lung capacity, cancer and increased mortality. Produces haze and limits visibility.	Dust and fume-producing industrial and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	Annual Avg.	20 ug/m <sup>3</sup>	---		
Fine Particulate Matter (PM2.5)	24 hours	---	35 ug/m <sup>3</sup>	Increases respiratory disease, lung damage, cancer, and premature death. Reduces visibility and results in surface soiling.	Fuel combustion in motor vehicles, equipment, and industrial sources; residential and agricultural burning; Also, formed from photochemical reactions of other pollutants, including NO <sub>x</sub> , sulfur oxides, and organics.
	Annual Avg.	12 ug/m <sup>3</sup>	12.0 ug/m <sup>3</sup>		
Lead	Monthly Ave.	1.5 ug/m <sup>3</sup>	---	Disturbs gastrointestinal system, and causes anemia, kidney disease, and neuromuscular and neurological dysfunction.	Present source: lead smelters, battery manufacturing & recycling facilities. Past source: combustion of leaded gasoline.
	Quarterly	---	1.5 ug/m <sup>3</sup>		
Hydrogen Sulfide	1 hour	0.03 ppm	No National Standard	Nuisance odor (rotten egg smell), headache and breathing difficulties (higher concentrations)	Geothermal Power Plants, Petroleum Production and refining
Sulfates	24 hour	25 ug/m <sup>3</sup>	No National Standard	Breathing difficulties, aggravates asthma, reduced visibility	Produced by the reaction in the air of SO <sub>2</sub> .
Visibility Reducing Particles	8 hour	Extinction of 0.23/km; visibility of 10 miles or more	No National Standard	Reduces visibility, reduced airport safety, lower real estate value, and discourages tourism.	See PM2.5.

ppm = parts per million; ug/m<sup>3</sup> = micrograms per cubic meter.

SOURCE: CARB, 2013c.

national and state ambient air quality standards and provides a brief discussion of the related health effects and principal sources for each pollutant.

Pursuant to the 1990 Federal CAA Amendments (FCAAA), the U.S. EPA classifies air basins (or portions thereof) as “attainment” or “nonattainment” for each criteria air pollutant, based on whether or not the NAAQS had been achieved. **Table 3.C-3** shows the current attainment status of the San Diego Air Basin.

**TABLE 3.C-3  
 SAN DIEGO AIR BASIN ATTAINMENT STATUS**

Pollutant	Designation/Classification	
	Federal Standards	State Standards
Ozone – one hour	No Federal Standard <sup>1</sup>	Nonattainment
Ozone – eight hour	Nonattainment	Nonattainment
PM10	Unclassified	Nonattainment
PM2.5	Unclassified/Attainment	Nonattainment
CO	Unclassified/Attainment	Attainment
Nitrogen Dioxide	Unclassified/Attainment	Attainment
Sulfur Dioxide	Attainment	Attainment
Lead	Unclassified/Attainment	Unclassified/Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Sulfates	No Federal Standard	Attainment
Visibility Reducing Particles	No Federal Standard	Unclassified

<sup>1</sup> Effective June 15, 2005, the U.S. Environmental Protection Agency (EPA) revoked the federal 1-hour ozone standard, including associated designations and classifications. EPA had previously classified the SJVAB as extreme nonattainment for this standard. EPA approved the 2004 Extreme Ozone Attainment Demonstration Plan on March 8, 2010 (effective April 7, 2010). Many applicable requirements for extreme 1-hour ozone nonattainment areas continue to apply to the SJVAB.

SOURCE: CARB. 2013d; USEPA 2015.

The Federal CAA requires each state to prepare an air quality control plan referred to as the State Implementation Plan (SIP). The CAA added requirements for states containing areas that violate the NAAQS to revise their SIPs to incorporate additional control measures to reduce air pollution. The SIP is a living document that is periodically modified to reflect the latest emissions inventories, planning documents, and rules and regulations of air basins as reported by the agencies with jurisdiction over them. The U.S. EPA has responsibility to review all state SIPs to determine if they conform to the mandates of the CAA and will achieve air quality goals when implemented. If the U.S. EPA determines a SIP to be inadequate, it may prepare a Federal Implementation Plan (FIP) for the nonattainment area and may impose additional control measures.

Failure to submit an approvable SIP or to implement the plan within mandated timeframes can result in sanctions being applied to transportation funding and stationary air pollution sources in the air basin.

### ***Toxic Air Contaminants***

TACs are regulated under both state and federal laws. Federal laws use the term “Hazardous Air Pollutants” (HAPs) to refer to the same types of compounds that are referred to as TACs under state law. Both terms encompass essentially the same compounds. The 1977 FCAAA required the U.S. EPA to identify National Emission Standards for Hazardous Air Pollutants (NESHAPs) to protect public health and welfare. These substances include certain volatile organic chemicals, pesticides, herbicides, and radionuclides that present a tangible hazard, based on scientific studies of exposure to humans and other mammals. Under the 1990 FCAAA, 189 substances are regulated as HAPs.

## **State**

### ***Criteria Air Pollutants***

CARB, a department of the California Environmental Protection Agency, oversees air quality planning and control throughout California. CARB is responsible for coordination and oversight of state and local air pollution control programs in California and for implementation of the California Clean Air Act (CCAA). The CCAA, which was adopted in 1988, requires CARB to establish the California Ambient Air Quality Standards (CAAQS). CARB has established CAAQS for sulfates, hydrogen sulfide, vinyl chloride, visibility-reducing particulate matter, and the above-mentioned criteria air pollutants. Applicable CAAQS are shown in Table 3.C-2.

The CCAA requires all local air districts in the state to endeavor to achieve and maintain the CAAQS by the earliest practical date. The act specifies that local air districts shall focus particular attention on reducing the emissions from transportation and area-wide emission sources, and provides districts with the authority to regulate indirect sources.

Among CARB’s other responsibilities are overseeing compliance by local air districts with California and federal laws; approving local air quality plans; submitting SIPs to USEPA; monitoring air quality; determining and updating area designations and maps; and setting emissions standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels.

### ***Toxic Air Contaminants***

Air quality regulations also focus on TACs. In general, for those TACs that may cause cancer, there is no concentration that does not present some risk. In other words, there is no safe level of exposure. This contrasts with the criteria air pollutants, for which acceptable levels of exposure can be determined and for which the ambient standards have been established. Instead, USEPA and CARB regulate HAPs and TACs, respectively, through statutes and regulations that generally require the use of the MACT or best available control technology (BACT) for toxics and to limit emissions. These statutes and regulations, in conjunction with additional rules set forth by the districts, establish the regulatory framework for TACs.

TACs in California are regulated primarily through the Tanner Air Toxics Act (Assembly Bill [AB] 1807 [Chapter 1047, Statutes of 1983]) and the Air Toxics Hot Spots Information and Assessment Act (Hot Spots Act) (AB 2588 [Chapter 1252, Statutes of 1987]). AB 1807 sets forth a formal procedure for CARB to designate substances as TACs. This includes research, public participation, and scientific peer review before CARB can designate a substance as a TAC. To date, CARB has identified more than 21 TACs and adopted USEPA's list of HAPs as TACs. Most recently, diesel PM was added to the CARB list of TACs. Once a TAC is identified, CARB then adopts an airborne toxics control measure (ATCM) for sources that emit that particular TAC. If there is a safe threshold for a substance at which there is no toxic effect, the control measure must reduce exposure below that threshold. If there is no safe threshold, the measure must incorporate BACT to minimize emissions.

The Air Toxics Hot Spots Information and Assessment Act requires existing facilities emitting toxic substances above a specified level to prepare a toxic-emission inventory, prepare a risk assessment if emissions are significant, notify the public of significant risk levels, and prepare and implement risk reduction measures.

CARB published the Air Quality and Land Use Handbook: A Community Health Perspective (Handbook), which provides guidance concerning land use compatibility with TAC sources (CARB, 2005). Although it is not a law or adopted policy, the Handbook offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, commercial distribution centers, rail yards, ports, refineries, dry cleaners, gasoline stations, and industrial facilities, to help keep children and other sensitive populations out of harm's way.

## San Diego Air Pollution Control District

SDAPCD is the agency responsible for protecting the public health and welfare through the administration of federal and state air quality laws and policies. Included in SDAPCD's tasks are the monitoring of air pollution, the preparation of San Diego County's portion of the SIP, and the promulgation of rules and regulations. The SIP includes strategies and tactics to be used to attain and maintain acceptable air quality in the County; this list of strategies is called the San Diego Regional Air Quality Strategy (RAQS) (SDAPCD, 2009). The rules and regulations include procedures and requirements to control the emission of pollutants and prevent significant adverse impacts.

The following SDAPCD rules and regulations apply to new construction:

- **Regulation IV: Prohibitions; Rule 51: Nuisance.** Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property.
- **Regulation IV: Prohibitions; Rule 55: Fugitive Dust.** Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site.

- **Regulation IV: Prohibitions; Rule 67.0:** Architectural Coatings. Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce volatile organic compound (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

The RAQS contains six Transportation Control Measures that are consistent with program commitments made in the 2007 Regional Transportation Plan (RTP) and the 2006 Regional Transportation Improvement Program (RTIP) adopted and implemented by SANDAG. The six RAQS Transportation Control Measures relate to: (1) Transit Improvements; (2) Vanpools; (3) High-Occupancy Vehicle (HOV) Lanes; (4) Park-and-Ride Facilities; (5) Bicycle Facilities; and (6) Traffic Signal Improvements. SDAPCD's Indirect Source Program, adopted by the District Board in December 1997, consists of ongoing outreach and assistance to local governments, land developers, and neighborhood groups to reduce vehicle trips and associated emissions through voluntary land use and street design improvements (i.e., "smart growth") (SDAPCD, 2009).

SDAPCD provides ongoing technical assistance to SANDAG on programs to encourage smart growth. SDAPCD also provided technical assistance to the City of San Diego in revising their General Plan, Pedestrian Master Plan and traffic calming programs to reflect greater reliance on transit and non-motorized transportation modes. SDAPCD has also conducted public workshops and other forms of public outreach focused on improving the conditions for pedestrians, bicyclists, and transit.

### ***San Diego General Plan***

The City's General Plan, updated in 2008, sets out a long-range vision and comprehensive policy framework for how the City should grow and develop, provide public services, and maintain the qualities that define San Diego over the next 20 to 30 years.

#### **Relevant General Plan Policies**

The following policies of the Conservation Element of the General Plan specifically address air quality:

- CE-F.1 Develop and adopt a fuel efficiency policy to reduce fossil fuel use by City departments, and support community outreach efforts to achieve similar goals in the community.
- CE-F.2 Continue to upgrade energy conservation in City buildings and support community outreach efforts to achieve similar goals in the community.
- CE-F.3 Continue to use methane as an energy source from inactive and closed landfills.
- CE-F.4 Preserve and plant trees, and vegetation that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.
- CE-F.5 Promote technological innovations to help reduce automobile, truck, and other motorized equipment emissions.
- CE-F.6 Encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking,

bicycling, and walking. Continue to implement programs to provide City employees with incentives for the use of alternatives to single-occupancy vehicles.

CE-F.7 Influence the development of state, federal, and local actions to increase the use of alternative fuels.

CE-F.8 Influence the development of state, federal, and local efforts to increase fuel efficiency and reduce greenhouse gas emissions.

## C.4 Impacts and Mitigation Measures

### Significance Criteria

According to the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego, 2011), a significant impact with regard to air quality could occur if implementation of the CAP would:

- Result in a conflict with or obstruct implementation of the applicable air quality plan;
- Result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollutant concentrations;
- Create objectionable odors affecting a substantial number of people;
- Exceed 100 pounds per day of Particulate Matter (PM)(dust); or
- Result in the substantial alteration of air movement in the area of the project.

The Significance Determination Thresholds note that San Diego is designated "non-attainment" for ozone and particulate matter, and that CEQA review should include measures to reduce project-related ozone and particulate matter emissions to ensure that new developments do not contribute to San Diego's non-attainment status for these pollutants. The Significance Determination Thresholds provides the following screening criteria for projects that have the potential for increasing air emissions. Projects that do not meet these criteria (that is, that are smaller or would result in lower emissions) may be considered not to have significant emissions:

1. 950 Single-Family Units/9,500 Average Daily Trips (ADT);
2. 500 Single-Family Units/5,000 ADT, if the units include wood-burning fireplaces;
3. Level of Service Degradation for Roads;
4. 100 Pounds per Day PM10 (Airborne Dust) Criteria;
5. Stationary Sources.

### Impact Analysis

As indicated in Table 2-5 in Chapter 2, Project Description, several of the CAP strategies, actions, and supporting measures could have an impact on air quality. Many of these could encourage the construction of new or remodeled facilities that could result in construction-related air emissions.

The following proposed CAP Actions only have the potential to impact air quality from construction related emissions:

- **Action 1.5 Outdoor Landscaping Ordinance.** Supporting measures and steps that support implementation of this action could result in the 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.
- **Action 2.2 Municipal Zero Emissions Vehicles.** These actions could result in construction activities associated with development of electrical charging and other fueling infrastructure which could have an effect on air quality.
- **Action 2.3 Convert Municipal Waste Collection Trucks to Low Emission Fuel.** These actions could result in construction activities associated with development fueling infrastructure which could have an effect on air quality.
- **Action 3.2 Implement the City’s Pedestrian Master Plan in Transit Priority Areas.** These actions would result in renovations and retrofits of existing sidewalks, cross-walks, and pedestrian trails as well of construction of new pedestrian facilities that may result in short-term construction related impacts, and changes to circulation that could affect air quality.
- **Action 3.3 Implement the City’s Bicycle Master Plan.** These actions would result in renovations and retrofits of existing bike lanes and construction of new bike lanes and facilities that may result in short-term construction impacts and long-term effects on traffic and circulation that could affect air quality.
- **Action 3.5 Implement a Roundabouts Master Plan.** These actions would lead to short-term construction impacts and operational changes to traffic circulation that may affect air quality.

The following proposed CAP Actions could impact air quality in other ways, as summarized below and discussed under Issue 2:

- **Action 2.1 Community Choice Aggregation Program or Similar Program and Action 4.2 Capture Methane from Wastewater Treatment.** These actions could directly or indirectly lead to the construction and operation of large-scale renewable energy facilities, such as biomass or biogas conversion facilities, that have the potential for emissions of criteria pollutants, odors, and TACs.
- **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.** These actions would facilitate implementation of the City of Villages strategy and focus development in Transit Priority Areas. While this is intended to reduce vehicle miles travelled and to promote use of mass transit, walking, and bicycling, it may also result in short-term construction-related emission and long-term creation of localized pollution hotspots and exposure of sensitive receptors to nearby pollution sources.
- **Action 4.1 Divert Solid Waste and Capture Landfill Emissions.** This Action may result in new or expanded recycling and organics collection and processing programs and facilities, which could result in increased emissions of criteria pollutants, dust, and odors.



- **Action 5.1 Present to City Council for consideration a city-wide Urban Tree Planting Program.** The goal of this action is to achieve 15 percent urban canopy cover by 2020 and 35 percent urban canopy cover by 2035.

*Issue 1: Would implementation of the CAP affect the ability of the RAQS to meet the federal and state clean air standards, or conflict with implementation of other regional air quality plans?*

The SDAPCD RAQS is the regional air quality plan that is applicable to the City of San Diego. The RAQS contains rules and regulations that are implemented by the SDAPCD to help the region meet the clean air standards required by federal and state law. The RAQS relies on projected growth in the County as well as mobile, area and other sources of emissions, as obtained from CARB and SANDAG to project future emissions within the County. Based on these emissions, reduction strategies are determined to reduce emissions in order to achieve or maintain attainment with State and Federal standards. CARB mobile source emissions projections and SANDAG growth projections are based on information provided by city and County general plans. Therefore, projects that propose development that is consistent with the applicable general plan would be consistent with the RAQS. If the project's growth exceeds the projections anticipated in the general plan then the project would conflict with the RAQS and the SIP. The CAP does not include any proposed strategies or actions that would increase growth beyond that anticipated in the City's General Plan.

The purpose of the CAP is to reduce GHG emissions and mitigate for the negative effects of global climate change. 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 overall.

As the CAP includes reduction strategies that would reduce air emission, it would have a beneficial impact on air quality in the City compared to conditions without the Project. Implementation of the CAP would not affect the ability of the RAQS to meet the federal and state clean air standards, or conflict with implementation of other regional air quality plan. The CAP supports the land use patterns and transportation improvements in the SANDAG RTP/SCS and the City's General Plan. In doing so, the CAP supports the primary goals of the RAQS and therefore would not conflict with or obstruct implementation of the primary goals of an applicable air quality plan.

### **Significance of Impact**

Overall, the implementation of the CAP provides beneficial impact.

### **Mitigation Framework**

No mitigation is required.

***Issue 2: 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?***

As noted above, several proposed CAP actions have the potential to result in construction emissions, operational emissions, or both. Emissions associated with proposed CAP actions may be mobile emissions (from increased vehicle use or use of mobile construction equipment), stationary sources (such as may occur from operation of energy generation facilities and waste processing facilities), and area sources, such as fugitive dust emissions from construction sites. The following discussion examines the potential for proposed CAP actions to result in significant air emissions during construction and operation.

**Construction**

As noted above, implementation of several of the proposed CAP actions which entail new or remodeled construction could result in short-term construction-related air emissions. Some proposed CAP actions and supporting measures under Strategy 1, Energy and Water Efficient Buildings, involve minor construction activities, such as energy and water efficiency upgrades to existing buildings that are not expected to result in substantial construction emissions. The proposed CAP actions that are likely to result in construction emissions are Actions 1.5, 2.1, 2.2, 2.3, 3.1, 3.2, 3.3, 3.5, 3.6, and 4.2.

Several of these actions, if implemented, could result in relatively large construction projects, such as development of large-scale renewable energy facilities under Action 2.1; in-fill development and redevelopment within Transit Priority Areas, facilitated by Actions 3.1 and 3.6; and new or expanded wastewater and solid waste processing facilities under Actions 4.1 and 4.2.

Construction activities result in short-term increases in emissions of ozone-precursor pollutants (i.e., ROG and NO<sub>x</sub>) and emissions of PM. Emissions of ozone precursors result from the operation of on-road and off-road motorized vehicles and equipment associated with construction activities. Emissions of airborne PM are largely associated with ground-disturbing activities, such as those occurring during site preparation. Localized concentrations of construction-generated TAC emissions, including emissions of DPM from diesel-powered equipment, can increase health risk for nearby sensitive receptors.

The Significance Determination Thresholds (City of San Diego, 2011) notes that the 100 pounds per day PM<sub>10</sub> screening criteria may be associated with construction projects that involve grading of four acres per day without dust controls. Demolition of existing structures also has the potential for high dust potential.

Proposed CAP actions expected to result in construction activities that would disturb less than four acres per day, not involve substantial demolition of existing structures, only have a temporary effect on intersection level of service, and involve limited use of diesel-powered equipment include proposed CAP Action 2.2 Municipal Zero Emissions Vehicles, Action 2.3 Convert Municipal Waste Collection Trucks to Low Emission Fuel, Action 3.2 Implement the City's Pedestrian Master Plan in Transit Priority Areas, Action 3.3 Implement the City's Bicycle

Master Plan, Action 3.5 Implement a Roundabouts Master Plan, and small-scale, distributed renewable energy facilities developed as an indirect result of Action 2.1 Community Choice Aggregation. Each project undertaken pursuant to these proposed CAP actions would not result in significant construction-related emissions. However, it is possible that several small-scale construction activities could be underway simultaneously in the City that together may involve grading of four or more acres of land. Therefore, the potential exists for a significant air quality impact from implementation of these CAP actions.

The only proposed CAP actions likely to involve individual construction projects of sufficient scale to involve grading of at least four acres per day, substantial demolition of existing structures, substantial reduction of roadway level of service, and substantial use of diesel-powered equipment are those that facilitate implementation of the City of Villages strategy (Actions 3.1 and 3.6); and those that may involve construction or expansion of major infrastructure projects (Actions 1.5, 2.1, 4.1, and 4.1). Depending on the scale and intensity of construction activities taking place as a result of implementation of these actions, they could result in significant construction-related air emissions.

### **Operations**

Implementation of several proposed CAP actions could result in operations-related emissions. These include Actions 2.1, 3.1, 3.6, 4.1, and 4.2. While the intent of the City of Villages strategy is to reduce reliance on the automobile and therefore reduce emissions, it would also result in concentrated, mixed-use development close to transit facilities. This may result in locating residences and other sensitive receptors close to existing emissions sources, and for localized increases in traffic-related emissions. Proposed CAP actions 3.1 and 3.6 would facilitate implementation of the City of Villages strategy, and may result in development that would exceed one or more of the significance screening criteria noted in the Significance Thresholds discussion, above, including more than 950 Single-Family Units/9,500 ADT, or 500 Single-Family Units with wood-burning fireplaces/5,000 ADT; specified Level of Service Degradation for Roads; and Stationary Sources. As noted in the Final Program Environmental Impact Report for the City's 2008 General Plan update (General Plan PEIR), implementation of the City of Villages strategy may result in significant air emissions. Other proposed CAP actions would increase use of alternative modes of transportation, including bicycling and walking, and would improve traffic flow through timing of traffic lights and installation of traffic roundabouts. These would tend to reduce emissions associated with implementation of the City of Villages strategy.

Proposed CAP Action 2.1 Community Choice Aggregation Program may result in development of large-scale renewable energy facilities. These may include combustion (biomass, biogas) facilities that would be considered stationary sources, and which may therefore result in significant operational air emissions. Large-scale solar and wind power facilities would not be considered a stationary source and are not associated with substantial operational emissions. Typically operational activities associated with these facilities include occasional maintenance and washing of solar panels. Operation of renewable energy facilities that do not entail stationary sources would not have the potential for a significant operational air emissions impact.

Proposed CAP Action 4.1 Divert Solid Waste and Capture Landfill Emissions and Action 4.2 Methane Capture from Wastewater Treatment Plants both may involve operation of new or expanded facilities, including composting facilities, methane or biogas generation, capture, and combustion facilities that may emit criteria pollutants and TACs, and solid waste processing facilities that have the potential to produce dust and odors. These facilities would likely be considered stationary sources and therefore would have the potential for significant air emissions impacts.

Proposed CAP Action 4.1 Divert Solid Waste and Capture Landfill Emissions, may result in specific measures that would change solid waste collection and handling in the City. Supporting measures for this action include change to weekly collection of recycling and greenwaste, and addition of food scraps to the greenwaste collection program. These would result in the increase in the number of weekly collections serving each household or business, and a substantial increase in VMT by collection vehicles, and therefore the potential for increased air emissions. Proposed CAP Action 2.3 Conversion of Waste Collection Vehicles to Alternative Fuel would reduce emissions rates for collection vehicles, and would partially or completely offset the increase in collection vehicle VMT. However, the conversion would not be complete until 2035. Furthermore, this action only addresses collection vehicles. Proposed CAP Action 4.1 may also result in the use of new or different waste processing facilities, such as composting facilities, anaerobic digesters, and material recovery facilities. In some instances, the haul distance to these facilities from local transfer stations may be longer than the current haul distance. This could result in increased VMT by diesel powered long-haul trucks and increased air emissions. This could also result in significant air emissions.

Proposed CAP Action 5.1 Present to City Council an Urban Tree Planting Program would result in greater urban tree canopy in the City. Trees absorb CO<sub>2</sub> as well as other air pollutants, including PM, ozone, Nitrogen Dioxide, and Sulfur Dioxide (Nowak, 2002). Proposed CAP Action 5.1 would improve ambient air quality in the City by removing air pollutants.

### **Significance of Impact**

As described above, construction associated with implementation of most of the proposed CAP actions individually does not have the potential to result in substantial air emissions. However, simultaneous implementation of multiple small projects pursuant to CAP actions, and implementation of actions involving large-scale construction, could result in significant construction-related emissions.

In addition, the potential for proposed CAP Action 4.1 Divert Solid Waste and Capture Landfill Emissions has the potential to result in a significant impact from increased VMT by waste collection and waste hauling vehicles.

As discussed above, implementation of the City of Villages strategy, as facilitated by the CAP, has the potential to result in significant impacts to air quality. However, because 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.

Also as noted above, development of large-scale renewable energy facilities, water recycling facilities, and waste processing facilities could potentially result in significant air impacts during construction and operation. The CAP contains no specific plans for developing such facilities, but only anticipates that they may be developed in the future, and such impacts would be site- and project-specific. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects' consistency with the goals, policies, and recommendations of the General Plan. As future environmental analysis would be required for specific public utilities projects necessary to implement the CAP, air quality impacts associated with construction and operation of new or substantially altered facilities would be addressed at the project-level. Furthermore, new or revised stationary sources, such as those that may occur with implementation of proposed CAP Action 2.1 Community Choice Aggregation, Action 4.1 Divert Solid Waste and Capture Landfill Emissions, and Action 4.2 Methane Capture from Wastewater Treatment Plants, would be subject to permitting by the SDAPCD. The permitting process requires detailed emissions modeling and establishes emission limits for each pollutant. Stationary source permits are issued if the new or revised source will not result in emissions that will interfere with achievement of the RAQS.

### **Mitigation Framework**

#### **Mitigation Measure AIR-1: Best Available Control Measures for Construction Emissions**

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:

- Minimizing simultaneous operation of multiple construction equipment units;
- Use of low pollutant emitting equipment;
- Use of catalytic reduction for gasoline-powered equipment;
- Watering the construction area to minimize fugitive dust; and
- Minimizing idling time by construction vehicles.

#### **Mitigation Measure AIR-2: Reduce Emissions from Expanded Recycling and Organics Collection Programs**

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 NO<sub>x</sub> emissions. This will be 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 NO<sub>x</sub> emissions.

### **Significance after Mitigation**

Implementation of the Mitigation Measure AIR-1 for construction activities associated with CAP actions involving small-scale construction would be sufficient to reduce construction emissions to less than significant. Mitigation Measure AIR-2 would reduce emissions associated with increased VMT from waste collection and waste hauling vehicles. This measure would reduce the impact of proposed CAP Action 4.1 to less than significant.

Air quality impacts associated with construction and operation of large facilities that could be proposed as a part of CAP Action 2.1 would remain significant even with implementation of Mitigation Measure AIR-1. Because the degree of air quality impacts associated with construction and operation of large facilities cannot be accurately predicted, and because the applicability, feasibility, and success of AIR-1 cannot be accurately predicted for large facilities, the program-level impact related to air quality is considered significant and unavoidable.

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## D. Greenhouse Gases

### D.1 Introduction

This section analyzes potential greenhouse gas related impacts that could result from implementation of the City of San Diego (City) Climate Action Plan (CAP).

### D.2 Environmental Setting

#### Greenhouse Gases and Climate Change

“Global warming” and “global climate change” are the terms used to describe the observed increase in the average temperature of the earth’s near-surface air and oceans since the mid-20th century and its projected continuation. Warming of the climate system is now considered to be unequivocal (IPCC, 2013), with global surface temperature increasing approximately 1.33 degrees Fahrenheit (°F) over the last 100 years. Continued warming is projected to increase global average temperature between two and 11°F over the next 100 years.

GHGs play a critical role in determining the Earth’s surface temperature. Solar radiation enters the Earth’s atmosphere from space, and a portion of the radiation is absorbed by the Earth’s surface. Earth re-radiates this energy back toward space, but the properties of the radiation change from high-frequency solar radiation to lower-frequency infrared radiation. GHGs, which are transparent to solar radiation, are effective in absorbing infrared radiation. As a result, this radiation (that otherwise would have escaped back into space) is now retained in the atmosphere, and results in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on Earth. Without the greenhouse effect, the Earth would not be able to support life as we know it.

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), chlorofluorocarbons (CFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF<sub>6</sub>). Much of the scientific literature suggests that human-caused emissions of these GHGs in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of unnatural warming of the Earth’s climate, known as global climate change or global warming. While there is some debate regarding this issue, it is unlikely that global climate change of the past 50 years can be explained without contribution from human activities (IPCC, 2013).

CO<sub>2</sub> equivalent (CO<sub>2</sub>e) is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. Expressing emissions in CO<sub>2</sub>e takes the contributions to the greenhouse effect of all GHG emissions and converts them to the equivalent effect that would occur if only CO<sub>2</sub> were being emitted. This measurement, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. For example, as described in Appendix [BA, Calculation References](#) Methods for Estimating Greenhouse Gas



Reductions, of the General Reporting Protocol of the California Climate Action Registry, one ton of CH<sub>4</sub> has the same contribution to the greenhouse effect as approximately 25 tons of CO<sub>2</sub> (IPCC, 2007). Therefore, CH<sub>4</sub> is a much more potent GHG than CO<sub>2</sub>.

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one year to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables and cannot be pinpointed, it is understood that more CO<sub>2</sub> is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO<sub>2</sub> emissions, approximately 54 percent is sequestered through ocean uptake, uptake by northern hemisphere forest regrowth, and other terrestrial sinks within one year, whereas the remaining 46 percent of human-caused CO<sub>2</sub> emissions remains stored in the atmosphere (Seinfeld and Pandis, 1998).

Similarly, impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and toxic air contaminants. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, it is clear that the quantity is enormous, and no single project would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

## **Greenhouse Gas Emission Sources**

According to the majority of the scientific literature on this topic, emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, utility, residential, commercial, and agricultural sectors (CARB, 2014a). Emissions of CO<sub>2</sub> are a largely a byproduct of fossil fuel combustion. Methane, a highly potent GHG, results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) and is largely associated with agricultural practices and landfills. Nitrous oxide is also largely attributable to agricultural practices and soil management. Carbon dioxide sinks, or reservoirs, include vegetation and the ocean, which absorb CO<sub>2</sub> through sequestration and dissolution, respectively, two of the most common processes of CO<sub>2</sub> sequestration.

## **Impacts of Climate Change**

Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more frequent and long-lasting droughts. Secondary effects are likely to include the displacement of thousands of coastal businesses and residences, reduced potable water supply, lower crop yields, changes in disease vectors, and impacts to habitat and biodiversity. As the California Air Resources Board (CARB) *Climate Change Scoping Plan* noted, the legislature in enacting Assembly Bill (AB) 32 found that global warming would cause detrimental effects to

some of the state's largest industries, including agriculture, winemaking, tourism, skiing, commercial and recreational fishing, forestry, and the adequacy of electrical power generation. The *Climate Change Scoping Plan* states as follows: "The impacts of global warming are already being felt in California. The Sierra snowpack, an important source of water supply for the state, has shrunk ten percent in the last 100 years. It is expected to continue to decrease by as much as 25 percent by 2050. World-wide changes are causing sea levels to rise – about eight inches of increase has been recorded at the Golden Gate Bridge over the past 100 years – threatening low coastal areas with inundation and serious damage from storms" (CARB, 2008).

### ***Ecosystem and Biodiversity Impacts***

Climate change is expected to impact a broad range of ecosystems, from alpine to deep-sea habitat (U.S. EPA, 2014). As temperatures and precipitation change, seasonal shifts in vegetation would occur; this could affect the distribution of associated flora and fauna species. As the range of species shifts, habitat fragmentation could occur, with acute impacts on the distribution of certain sensitive species. The IPCC states that "20 percent to 30 percent of species assessed may be at risk of extinction from climate change impacts within this century if global mean temperatures exceed two to three degrees celsius (3.6 to 5.4°F) relative to pre-industrial levels" (IPCC, 2007). Shifts in existing biomes could also make ecosystems vulnerable to encroachment by invasive species. Wildfires, which are an important control mechanism in many ecosystems, may become more severe and more frequent, making it difficult for native plant species to repeatedly re-germinate. In general terms, climate change is expected to put a number of stressors on ecosystems, with potentially catastrophic effects on biodiversity.

### ***Human Health Impacts***

Climate change may increase the number of heat-related illnesses and deaths, and warmer temperatures could increase the concentrations of unhealthy air and water pollutants. Changes in temperature, precipitation patterns, and extreme events could enhance the spread of some diseases, particularly vector-borne infectious diseases found in tropical areas and spread by insects such as malaria, dengue fever, West Nile Virus, and encephalitis (U.S. EPA, 2013). While these health impacts would largely affect tropical areas in other parts of the world, effects would also be felt in California. Warming of the atmosphere would be expected to increase smog and particulate pollution, which could adversely affect individuals with heart and respiratory problems, such as asthma. Extreme heat events would also be expected to occur with more frequency and could adversely affect the elderly, children, and the homeless. Finally, the water supply impacts and seasonal temperature variations expected as a result of climate change could affect the viability of existing agricultural operations, making the food supply more vulnerable.

## **Greenhouse Gas Emissions Estimates**

### ***Global Emissions***

Worldwide emissions of GHGs in 2004 were 30 billion tons of CO<sub>2</sub>e per year (UNFCCC, 2012). This includes both ongoing emissions from industrial and agricultural sources, but excludes emissions from land use changes. In 2011, the atmospheric concentration of CO<sub>2</sub> was estimated at

approximately 390 parts per million (ppm), or about 40 percent greater than in 1750 (IPCC, 2013).

### ***U.S. Emissions***

In 2009, the United States emitted about 6.7 billion tons of CO<sub>2</sub>e or about 21 tons per year per person. Of the four major sectors nationwide — residential, commercial, industrial, and transportation — transportation accounts for the highest fraction of GHG emissions (approximately 33 percent); these emissions are entirely generated from direct fossil fuel combustion (U.S. EPA, 2011).

### ***State of California Emissions***

California is the 12th to 16th largest emitter of CO<sub>2</sub> in the world (CEC, 2006). California produced approximately 459 million gross metric tons of CO<sub>2</sub>e in 2012 (CARB, 2014a). Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2012, accounting for 36 percent of total GHG emissions in the state. This sector was followed by the electric power section (including both in-state and out-of-state sources) (21 percent) and the industrial sector (19 percent) (CARB, 2014a).

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

In response to the State's efforts and to ensure the City of San Diego contributes its fair share to statewide GHG reductions, the City prepared the CAP that identifies measures to effectively meet GHG reduction targets for 2020, as well as 2035 which serves as an "interim" target toward meeting the state's longer term 2050 target. The CAP contains five chapters: Background, Reducing Emissions, Implementation and Monitoring, Social Equity and Job Creation, and Adaptation.

The GHG emissions inventory evaluated energy and other emissions-related activities within the City of San Diego in the baseline year 2010 for five major sectors, including residential buildings, nonresidential buildings and facilities, transportation, water, solid waste, and municipal operations. Emissions were associated with a variety of sources, including direct combustion of fossil fuels, purchased electricity, transportation (gasoline and diesel), solid waste, potable water, and materials. These sources are described in greater detail in Appendix ~~C~~A of the CAP. The CAP estimates the GHG emissions for the City of San Diego in the baseline year 2010 to be around 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).

## **D.3 Regulatory Setting**

The following sections summarize federal, state and local regulations regarding energy, GHGs and global climate change. A variety of agencies work jointly as well as individually to understand and regulate the effects of greenhouse gas emissions and resulting climate change through legislation, planning, policy-making, education, and programs.

## Federal

### ***Federal Clean Air Act***

The federal CAA requires the U.S. EPA to define national ambient air quality standards to protect public health and welfare in the U.S. The CAA does not specifically regulate GHG emissions; however, on April 2, 2007, the U.S. Supreme Court in *Massachusetts v. U.S. Environmental Protection Agency*, determined that GHGs are pollutants that can be regulated under the CAA. Currently, there are no federal regulations that establish ambient air quality standards for GHGs.

On December 7, 2009, U.S. EPA adopted its Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the CAA (Endangerment Finding). The Endangerment Finding is based on Section 202(a) of the CAA, which states that the U.S. EPA Administrator should regulate and develop standards for “emission[s] of air pollution from any class or classes of new motor vehicles or new motor vehicle engines, which in [its] judgment cause, or contribute to, air pollution which may reasonably be anticipated to endanger public health or welfare.” The rule addresses Section 202(a) in two distinct findings. The first addresses whether the concentrations of the six key GHGs (CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, and SF<sub>6</sub>) in the atmosphere threaten the public health and welfare of current and future generations. The second addresses whether the combined emissions of GHGs from new motor vehicles and motor vehicle engines contribute to atmospheric concentrations of GHGs and, therefore, contribute to the threat of climate change.

The U.S. EPA Administrator determined that atmospheric concentrations of GHGs endanger the public health and welfare within the meaning of Section 202(a) of the CAA. The evidence supporting this finding consists of human activity resulting in “high atmospheric levels” of GHG emissions, which are likely responsible for increases in average temperatures and other climatic changes. Furthermore, the observed and projected results of climate change (e.g., higher likelihood of heat waves, wild fires, droughts, sea level rise, higher intensity storms) are a threat to the public health and welfare. Therefore, GHGs were found to endanger the public health and welfare of current and future generations.

The U.S. EPA Administrator also found that GHG emissions from new motor vehicles and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. The findings do not in and of themselves impose any emission reduction requirements but, rather, allow USEPA to finalize the GHG standards proposed earlier in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation.

### ***Energy Policies and Programs***

At the federal level, the U.S. Department of Transportation, U.S. Department of Energy, and USEPA have substantial influence over energy policies and programs. Generally, federal agencies influence transportation energy consumption through establishment and enforcement of fuel economy standards for automobiles and light trucks, through funding of energy-related research and development projects, and through funding for transportation infrastructure projects. In addition, the Federal Energy Regulatory Commission (FERC) is an independent

agency that regulates the interstate transmission of electricity, natural gas, and oil. FERC also reviews proposals to build liquefied natural gas (LNG) terminals and interstate natural gas pipelines as well as licensing hydropower projects. Licensing of hydroelectric facilities under the authority of FERC includes input from State and Federal energy and power generation, environmental protection, fish and wildlife, and water quality agencies. The California Energy Commission's Systems Assessment and Facilities Siting Division coordinates with FERC to ensure that needed energy facilities are authorized in an expeditious, safe, and environmentally acceptable manner.

The National Energy Policy, developed in May 2001, proposes recommendations on energy use and on the repair and expansion of the nation's energy infrastructure. The policy is based on the finding that growth in U.S. energy consumption is outpacing the current rate of production. Based on this policy document, during the years 2000 to 2020, consumption of oil is predicted to increase by 33 percent, natural gas by over 50 percent, and electricity by 45 percent. While federal policy promotes further improvements in energy use through conservation, it focuses on increased development of domestic oil, gas, and coal and the use of hydroelectric and nuclear power resources. To address the over-reliance on natural gas for new electric power plants, the federal policy proposes research in clean coal technology and expanding generation to include energy derived from landfill gas, wind, and biomass sources.

## **State of California**

### ***California Air Resources Board***

CARB is the agency responsible for coordination and oversight of state and local air pollution control programs in California.

There are currently no state regulations in California that establish ambient air quality standards for GHGs. However, California has passed laws directing CARB to develop actions to reduce GHG emissions, and several state legislative actions related to climate change and GHG emissions have come into play in the past decade.

### ***California Energy Commission***

The California Energy Commission (CEC) is California's primary energy policy and planning agency. Created by the California Legislature in 1974, the CEC has five major responsibilities: 1) forecasting future energy needs and keeping historical energy data; 2) licensing thermal power plants 50 MW or larger; 3) promoting energy efficiency through appliance and building standards; 4) developing energy technologies and supporting renewable energy; and 5) planning for and directing State response to energy emergencies. Under the requirements of the California Public Resources Code, the CEC in conjunction with the California Department of Conservation (DOC) Division of Oil, Gas, and Geothermal Resources is required to assess electricity and natural gas resources on an annual basis or as necessary.

The State of California regulates energy consumption under Title 24 of the California Code of Regulations. The Title 24 Building Energy Efficiency Standards were developed by the CEC and

apply to energy consumed for heating, cooling, ventilation, water heating, and lighting in new residential and non-residential buildings. The CEC updates these standards periodically.

### ***California Public Utilities Commission***

The California Public Utilities Commission (CPUC) is a State agency created by a constitutional amendment to regulate privately-owned utilities providing telecommunications, electric, natural gas, water, railroad, rail transit, and passenger transportation services, and in-State moving companies. The CPUC is responsible for assuring that California utility customers have safe, reliable utility services at reasonable rates, while protecting utility customers from fraud. The CPUC regulates the planning and approval for the physical construction of electric generation, transmission, or distribution facilities; and local distribution pipelines of natural gas.

### ***Assembly Bill 1493***

In 2002, then-Governor Gray Davis signed AB 1493, which required CARB to develop and adopt, by January 1, 2005, regulations that achieve “the maximum feasible reduction of GHGs emitted by passenger vehicles and light-duty trucks and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the state.”

To meet the requirements of AB 1493, CARB approved amendments to the California Code of Regulations (CCR) in 2004, adding GHG emissions standards to California’s existing standards for motor vehicle emissions. Amendments to Title 13 CCR, Sections 1900 and 1961 (13 CCR 1900, 1961), and adoption of Section 1961.1 (13 CCR 1961.1), require automobile manufacturers to meet fleet-average GHG emissions limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty passenger vehicle weight classes (i.e., any medium-duty vehicle with a gross vehicle weight rating of less than 10,000 pounds and which is designed primarily for the transportation of persons), beginning with model year 2009. For passenger cars and light-duty trucks with a loaded vehicle weight (LVW) of 3,750 pounds or less, the GHG emission limits for model year 2016 are approximately 37 percent lower than the limits for the first year of the regulations, model year 2009. For light-duty trucks with an LVW of 3,751 pounds to a gross vehicle weight of 8,500 pounds, as well as for medium-duty passenger vehicles, GHG emissions will be reduced approximately 24 percent between 2009 and 2016.

Because the Pavley standards (named for the bill’s author, state Senator Fran Pavley) would impose stricter standards than those under the federal CAA, California applied to the U.S. EPA for a waiver under the federal CAA, which was granted in 2009.

### ***Executive Order S-3-05***

Executive Order S-03-05, which was signed by Governor Schwarzenegger in 2005, proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra’s snowpack, further exacerbate California’s air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total GHG emission targets. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80 percent below the 1990 level by 2050.

The Executive Order directed the Secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The Secretary will also submit biannual reports to the governor and state legislature describing progress made toward reaching the emission targets, impacts of global warming on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with the Executive Order, the Secretary of CalEPA created the California Climate Action Team (CCAT) made up of members from various state agencies and commissions. CCAT released its first report in March 2006. The report proposed to achieve the targets by building on voluntary actions of California businesses, local government, and community actions, as well as through state incentive and regulatory programs.

### ***Assembly Bill 32 (California Global Warming Solutions Act of 2006)***

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act (AB 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. This reduction will be accomplished by enforcing a statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if the AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires CARB to adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrived at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state reduces GHG emissions enough to meet the cap. AB 32 also includes guidance on instituting emissions reductions in an economically efficient manner, along with conditions to ensure that businesses and consumers are not unfairly affected by the reductions. CARB has discretionary authority to seek greater reductions in the more significant and growing GHG sectors, such as transportation, as compared to other sectors that are not anticipated to significantly increase emissions.

### **Scoping Plan Provisions**

On December 11, 2008, CARB adopted its *Climate Change Scoping Plan*, 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 today's levels. According to the 2008 Scoping Plan, the 2020 target of MMT CO<sub>2</sub>e required the reduction of 169 MMT CO<sub>2</sub>e, or approximately 28.4 percent, from the state's projected 2020 business-as-usual (BAU) emissions level of 596 MMT CO<sub>2</sub>e. In August 2011, the Scoping Plan was re-approved by the Board and includes the Final Supplement to the Scoping Plan Functional Equivalent Document. This document includes expanded analysis of project alternatives as well as updates the 2020 emission projections in light of the current economic forecasts.

Considering the updated 2020 BAU estimate of 507 MMT CO<sub>2</sub>e, a 16 percent reduction below the estimated BAU levels would be necessary to return to 1990 levels by 2020. The document also excludes one measure identified in the 2008 Scoping Plan that has been adopted and one measure that is no longer under consideration by CARB (CARB, 2011).

The *Climate Change Scoping Plan Update* (CARB, 2014b) details 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* to meet the long-term reduction goal are associated with energy, transportation, agriculture, water, waste management, natural and working lands, short-lived climate pollutants, green buildings, and cap-and-trade.

### **Cap-and-Trade Program**

The Scoping Plan identified cap-and-trade as a key strategy for helping California reduce its GHG emissions (CARB, 2008). A cap-and-trade program sets the total amount of GHG emissions allowable for facilities under the cap and allows covered sources, including producers and consumers of energy, to determine the least expensive strategies to comply. AB 32 required CARB to adopt the cap-and-trade regulation by January 1, 2011, and the program itself began in November 2012.

Carbon offset credits are created through the development of projects, such as renewable energy generation or carbon sequestration projects, that achieve the reduction of emissions from activities not otherwise regulated, covered under an emissions cap, or resulting from government incentives. Offsets are verified reductions of emissions whose ownership can be transferred to others. As required by AB 32, any reduction of GHG emissions used for compliance purposes must be real, permanent, quantifiable, verifiable, enforceable, and additional. In January 2014, California connected its cap-and-trade program with that of Quebec, which increased the options for emission reductions and represents a step forward in California's efforts to collaborate with global partners to reduce GHGs (CARB, 2014b).

### **Executive Order S-1-07**

Executive Order S-1-07, which was signed by Governor Schwarzenegger in 2007, proclaims that the transportation sector is the main source of GHG emissions in California, generating more than 40 percent of statewide emissions. It establishes a goal to reduce the carbon intensity of transportation fuels sold in California by at least ten percent by 2020. This order also directs CARB to determine whether this Low Carbon Fuel Standard (LCFS) could be adopted as a discrete early-action measure as part of the effort to meet the mandates in AB 32.

On April 23, 2009, CARB approved the proposed regulation to implement the LCFS. The LCFS will reduce GHG emissions from the transportation sector in California by about 16 million MMT in 2020. The LCFS is designed to reduce California's dependence on petroleum, create a lasting market for clean transportation technology, and stimulate the production and use of alternative, low-carbon fuels in California. The LCFS is designed to provide a durable framework that uses market mechanisms to spur the steady introduction of lower carbon fuels. The framework



establishes performance standards that fuel producers and importers must meet each year beginning in 2011. One standard is established for gasoline and the alternative fuels that can replace it. A second similar standard is set for diesel fuel and its replacements.

### **Senate Bill 97**

SB 97, signed August 2007 (Chapter 185, Statutes of 2007; PRC Sections 21083.05 and 21097), acknowledges that climate change is a prominent environmental issue that requires analysis under CEQA. The bill directs the California Office of Planning and Research (OPR) to prepare, develop, and transmit to the California Natural Resources Agency, guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009. The Natural Resources Agency was required to certify or adopt those guidelines by January 1, 2010. On April 13, 2009, OPR submitted to the Secretary for Natural Resources its proposed amendments to the *CEQA Guidelines* for GHG emissions, as required by SB 97. On February 16, 2010, the Office of Administrative Law (OAL) approved the amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. The amendments became effective on March 18, 2010.

### **Senate Bills 1078 and 107 and Executive Orders S-14-08 and S-21-09**

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010.

In November 2008, then-Governor Schwarzenegger signed Executive Order S-14-08, which expands the state's Renewable Portfolio Standard to 33 percent renewable power by 2020. In September 2009, then-Governor Schwarzenegger continued California's commitment to the Renewable Portfolio Standard by signing Executive Order S-21-09, which directs CARB under its AB 32 authority to enact regulations to help the state meet its Renewable Portfolio Standard goal of 33 percent renewable energy by 2020.

The 33-percent-by-2020 goal was codified in April 2011 with Senate Bill X1-2, which was signed by Governor Edmund G. Brown, Jr. This new Renewable Portfolio Standard preempts CARB 33 percent Renewable Electricity Standard and applies to all electricity retailers in the state, including publicly owned utilities (POUs), investor-owned utilities, electricity service providers, and community choice aggregators. All of these entities must adopt the new Renewable Portfolio Standard goals of 20 percent of retail sales from renewables by the end of 2013 and 25 percent by the end of 2016, with the 33 percent requirement being met by the end of 2020.

### **Senate Bill 375**

SB 375, signed in September 2008 (Chapter 728, Statutes of 2008), aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a sustainable communities strategy (SCS) or alternative planning strategy (APS) that will prescribe land use allocation in

that MPO's regional transportation plan (RTP). CARB, in consultation with MPOs, has provided each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects may not be eligible for funding programmed after January 1, 2012.

This law also extends the minimum time period for the regional housing needs allocation cycle from five years to eight years for local governments located within an MPO that meet certain requirements. City or county land use policies (including general plans) are not required to be consistent with the regional transportation plan (and associated SCS or APS). However, new provisions of CEQA would incentivize (through streamlining and other provisions) qualified projects that are consistent with an approved SCS or APS, categorized as "transit priority projects."

### ***OPR's 2008 Technical Advisory***

On June 19, 2008, OPR published a technical advisory on CEQA and Climate Change. The advisory provided OPR's perspective on the emerging role of CEQA in addressing climate change and GHG emissions, while recognizing that approaches and methodologies for calculating GHG emissions and addressing environmental impacts through CEQA review are rapidly evolving. The advisory recognized that OPR would develop amendments to the State CEQA Guidelines pursuant to SB 97 as was done in 2010. The Natural Resources Agency would then adopt these amendments. The technical advisory pointed out that neither CEQA nor the CEQA Guidelines prescribe quantitative thresholds of significance or particular methodologies for performing an impact analysis by stating, "This is left to lead agency judgment and discretion, based upon factual data and guidance from regulatory agencies and other sources where available and applicable" (OPR, 2008). This deference to lead agencies was memorialized in the CEQA Guidelines Section 15064.4 as discussed below. OPR recommended, at the time, that "the global nature of climate change warrants investigation of a statewide threshold of significance for GHG emissions" (OPR, 2008).

Until such a standard is established, OPR advises that each lead agency should develop its own approach to performing analyses for projects that generate greenhouse gas emissions (OPR, 2008). Agencies should then assess whether the emissions are "cumulatively considerable" even though a project's GHG emissions may be individually limited. OPR states, "Although climate change is ultimately a cumulative impact, not every individual project that emits GHGs must necessarily be found to contribute to a significant cumulative impact on the environment" (OPR, 2008). Based on this, individual lead agencies may undertake a project-by-project analysis, consistent with available guidance and current CEQA practice (OPR, 2008).

If the lead agency determines emissions are a cumulatively considerable contribution to a significant cumulative impact, then the lead agency must investigate and implement ways to mitigate the emissions (OPR, 2008). OPR states that "Mitigation measures will vary with the type

of project being contemplated, but may include alternative project designs or locations that conserve energy and water, measures that reduce vehicle miles traveled (VMT) by fossil-fueled vehicles, measures that contribute to established regional or programmatic mitigation strategies, and measures that sequester carbon to offset the emissions from the project” (OPR, 2008). OPR concludes that “a lead agency is not responsible for wholly eliminating all GHG emissions from a project; the CEQA standard is to mitigate to a level that is “less than significant” (OPR, 2008). The technical advisory includes a list of mitigation measures that can be applied on a project-by-project basis.

### ***CEQA Guidelines Revisions***

In 2007, the State Legislature passed SB 97, which required amendment of the State CEQA Guidelines to incorporate analysis of, and mitigation for, GHG emissions from projects subject to CEQA. The California Natural Resources Agency adopted these amendments on December 30, 2009, and they took effect on March 18, 2010, after review by the Office of Administrative Law and filing with the Secretary of State for inclusion in the California Code of Regulations.

The Guidelines revisions include a new section (Sec. 15064.4) that specifically addresses the potential significance of GHG emissions. Section 15064.4 calls for a “good-faith effort” to “describe, calculate or estimate” GHG emissions; Section 15064.4 further states that the analysis of the significance of any GHG impacts should include consideration of the extent to which the project would increase or reduce GHG emissions; exceed a locally applicable threshold of significance; and comply with “regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.” The new Guidelines also state that a project may be found to have a less-than-significant impact on GHG emissions if it complies with an adopted plan that includes specific measures to sufficiently reduce GHG emissions (Sec. 15064(h)(3)). Importantly, however, the Guidelines do not require or recommend a specific analytical methodology or provide quantitative criteria for determining the significance of GHG emissions.

No quantitative significance threshold is included in the Amendments. The *CEQA Guidelines* afford the customary deference provided to lead agencies in their analysis and methodologies. OPR emphasizes the necessity of having a consistent threshold available to analyze projects, and the analyses should be performed based on the best available information. For example, if a lead agency determines that GHGs may be generated by a proposed project, the agency is responsible for assessing GHG emissions by type and source. The CEQA Guidelines Amendments provide the following recommendations for determining the significance of GHG emissions under Section 15064.4:

- (a) The determination of the significance of GHG emissions calls for a careful judgment by the lead agency consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based on available information, to describe, calculate or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:

- (1) Use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or
  - (2) Rely on a qualitative analysis or performance based standards.
- (b) A lead agency may consider the following when assessing the significance of impacts from GHG emissions on the environment:
- (1) The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
  - (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
  - (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such regulations or requirements must be adopted by the relevant public agency through a public review process and must include specific requirements that reduce or mitigate the project's incremental contribution of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The Amendments also include a new Subdivision 15064.7(c) which clarifies that in developing thresholds of significance, a lead agency may appropriately review thresholds developed by other public agencies, or recommended by other experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

In addition, the Amendments include a new Section 15183.5 that provides for tiering and streamlining the analysis of GHG emissions. Project-specific environmental documents may rely on an EIR containing a programmatic analysis of GHG emissions in the region over a specified time period.

Finally, the Amendments add a new set of environmental checklist questions (VII. Greenhouse Gas Emissions) to the CEQA Guidelines Appendix G, which are provided below under Thresholds of Significance.

### ***California Green Buildings Standard Code***

In January 2010, the State of California adopted the 2010 California Green Building Standards (CALGreen) Code, which became effective in January 2011. Building off of the initial 2008 California Green Building Code, the 2010 CALGreen Code represents a more stringent building code that requires, at a minimum, that new buildings and renovations in California meet certain sustainability and ecological standards. The 2010 CALGreen Code has mandatory Green Building provisions for all new residential buildings that are three stories or fewer (including hotels and motels) and all new non-residential buildings of any size that are not additions to existing buildings. As of January 2011, California requires that new buildings reduce water

consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials. CALGreen's mandatory measures establish a minimum for green construction practices, and incorporate environmentally responsible buildings into California cities. CALGreen allows jurisdictions to adopt stricter requirements than the mandatory minimum requirements in CALGreen.

In early 2013, the California Building Standards Commission adopted the 2013 California Building Standards Code that also included the latest 2013 CALGreen Code, which became effective on January 1, 2014. The mandatory provisions of the code are anticipated to reduce three MMT of GHG emissions by 2020, reduce water use by 20 percent or more, and divert 50 percent of construction waste from landfills. The 2013 California Energy Code (Title 24, Part 6), which is also part of the CALGreen Code (Title 24, Part 11, Chapter 5.2), became effective on July 1, 2014.

### ***Executive Order B-30-15***

On April 29, 2015, Governor Brown issued an executive order to establish a California greenhouse gas reduction target of 40 percent below 1990 levels by 2030. The executive order does all of the following:

- Establishes a new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030 in order to ensure California meets its target of reducing greenhouse gas emissions to 80 percent below 1990 levels by 2050;
- Directs all state agencies with jurisdiction over sources of greenhouse gas emissions to implement measures to achieve reductions of greenhouse gas emissions to meet the 2030 and 2050 greenhouse gas emissions reductions targets;
- Directs CARB to update the *Climate Change Scoping Plan* to express the 2030 target in terms of million metric tons of carbon dioxide equivalent;
- Directs the California Natural Resources Agency to update every three years the state's climate adaptation strategy, *Safeguarding California*, and ensure that its provisions are fully implemented;
- Directs all State agencies to take climate change into account in their planning and investment decisions, and to employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives;
- Directs State agencies' planning and investment to give priority to actions that both build climate preparedness and reduce greenhouse gas emissions; take flexible and adaptive approaches to prepare for uncertain climate impacts; protect the state's most vulnerable populations; and prioritize natural infrastructure solutions;
- Requires the state's Five-Year Infrastructure Plan to take current and future climate change impacts into account in all infrastructure projects;
- Directs the Governor's Office of Planning and Research to establish a technical advisory group to help state agencies incorporate climate change impacts into planning and investment decisions; and

- Directs the state to continue its climate change research program focused on understanding the impacts of climate change and how best to prepare and adapt to such impacts.

## **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. 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).~~

## **D.4 Impacts and Mitigation Measures**

### **Significance Criteria**

Based on Appendix G of the CEQA Guidelines, impacts related to GHG emissions may be considered significant if the proposed project would:

- Generate GHG emissions, either directly or indirectly, that may have a cumulatively significant impact on the environment; or
- Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs (e.g., CARB’s AB 32 Scoping Plan).

### **Impact Analysis**

As indicated in Table 2-5 in Chapter 2, Project Description, several of the CAP strategies, actions, and supporting measures could result in GHG emissions that would contribute to the cumulative effect of GHGs on climate; or they could conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. These actions include:

- **Action 1.5 Outdoor Landscaping Ordinance.** Supporting measures and steps that support implementation of this action could result in the 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. which could result in temporary increased GHG emissions.
- **Action 2.1 Community Choice Aggregation Program or Similar Program.** Supporting measures and steps that support implementation of this action could result in installation of

small scale and large scale renewable energy generation, transmission, and storage systems that could result in increased GHG emissions.

- **Action 2.2 Municipal Zero Emissions Vehicles.** These actions could result in construction activities associated with development of electrical charging and other fueling infrastructure which could result in increased GHG emissions.
- **Action 2.3 Convert Municipal Waste Collection Trucks to Low Emission Fuel.** These actions could result in construction activities associated with development of fueling infrastructure which could result in increased GHG emissions.
- **Action 3.1 Implement General Plan Mobility Element and City of Villages Strategy in Transit Priority Areas.** These actions would facilitate the implementation of the City of Villages strategy and the shift to greater emphasis on mass transit and other modes of transportation. These actions could, therefore, result in new construction and other physical changes that could result in increased GHG emissions.
- **Action 3.2 Implement the City's Pedestrian Master Plan in Transit Priority Areas.** These actions would result in renovations and retrofits of existing sidewalks, cross-walks, and pedestrian trails as well of construction of new pedestrian facilities that may result in short-term construction related impacts, and changes to circulation that could result in increased GHG emissions.
- **Action 3.3 Implement the City's Bicycle Master Plan.** These actions would result in renovations and retrofits of existing bike lanes and construction of new bike lanes and facilities that may result in short-term construction impacts and long-term effects on traffic and circulation that could result in increased GHG emission.
- **Action 3.5 Implement a Roundabouts Master Plan.** These actions would lead to short-term construction impacts and operational changes to traffic circulation that could result in increased GHG emission
- **Action 3.6 Implement Transit-Oriented Development within Transit Priority Areas.** These actions 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 traffic and circulation could result in increased GHG emissions.
- **Action 4.1 Divert Solid Waste and Capture Landfill Emissions.** This action could lead to the implementation of landfill gas collection operational procedures in compliance with the California Air Resources Board's Landfill Methane Capture regulations, as well as new or expanded programs to divert solid waste from landfill disposal. Some of these programs could result in increased GHG emissions.
- **Action 4.2 Capture Methane from Wastewater Treatment.** Associated actions could result in new or expanded wastewater treatment facilities, such as anaerobic digesters, that could increase increased GHG emissions.

While many of the proposed CAP actions would result in long-term reductions in GHG emissions, several involve construction of new or remodeled buildings and facilities that could result in short-term construction-related GHG. Several others may lead to construction of new facilities or programs that may have the potential to produce operational GHG emissions. These potential impacts are examined in detail below.

***Issue 1: Would implementation of the CAP generate GHG emissions, either directly or indirectly, that may have a cumulatively significant impact on the environment?***

As shown in Table 2-1 in the Project Description, the CAP estimates that the City's baseline GHG emissions in the year 2010 at around 13.0 MMT CO<sub>2</sub>e. Of this, 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 estimates that the City's unmitigated (i.e., "business as usual") emissions would reach 14.1 MMT CO<sub>2</sub>e by 2020 and around 16.74 MMT CO<sub>2</sub>e by 2035.

Implementation of the CAP would reduce per capita GHG emissions. Implementation of the CAP would also result in an overall decrease in GHG emissions citywide.

Strategies in the CAP rely on implementation of State legislation as well as local policies for emissions reductions. State actions designed to reduce emissions from energy use include: California's Renewable Portfolio Standard (RPS), which establishes the goal to procure 33 percent of electricity sales from renewable sources by 2020 and 50 percent by 2035, utility energy efficiency programs directed by the California Public Utilities Commission, Assembly Bill 1103 which established the Commercial Energy Use Disclosure Requirement, and Solar Programs offered by the State. State actions that reduce emissions from transportation include: California's Pavley I/CAFÉ standards, the Low Carbon Fuel Standard, electric vehicle policies and programs, and CARB's Tire Pressure Program and Heavy Duty Vehicle Aerodynamics Program. The CAP also includes reductions from improved transportation and land use planning that result from SANDAG's Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), as required by SB 375.

Implementation of the strategies in the CAP would result in an estimated reduction of ~~422,633~~ 423,116 MT CO<sub>2</sub>e by 2020, ~~2.4~~ 1.3 MMT CO<sub>2</sub>e by 2030, and ~~3.5~~ 2.5 MMT CO<sub>2</sub>e by 2035. This, along with the above described state and federal actions, would decrease the BAU emissions from 14.1 MMT CO<sub>2</sub>e to around 9.8 MMT CO<sub>2</sub>e in 2020, from 15.87 MMT CO<sub>2</sub>e to around 7.6 MMT CO<sub>2</sub>e in 2030, and from 16.74 MMT CO<sub>2</sub>e to 6.34 MMT CO<sub>2</sub>e in 2035. The City would implement a monitoring plan to ensure the strategies in the CAP achieve the anticipated GHG reductions.

Implementation of several of the proposed CAP actions which entail new or remodeled construction could result in short-term construction-related GHG emissions. Several proposed CAP actions have this potential, but do not have the potential for increased GHG emissions associated with operation of the program authorized by the CAP Action. Several other proposed CAP actions and supporting measures under Strategy 1, Energy and Water Efficient Buildings, involve minor construction activities, such as energy and water efficiency upgrades to existing buildings that are not expected to result in substantial construction-related GHG emissions. The proposed CAP actions that are likely to result in construction-related GHG emissions include: Actions 2.1, 2.2, 2.3, 3.2, 3.3 and 3.5. These actions would result in relatively small-scale, localized, and short-duration construction activities.



Construction activities typically emit GHGs from combustion of fossil fuels in diesel and gasoline-powered equipment and vehicles, and from use of electricity that is generated partially from sources that emit GHGs. Because these proposed CAP actions would be limited in extent and duration, they would emit relatively small amounts of GHGs. Furthermore, each of these proposed actions is expected to result in long-term, substantial reductions in GHG emissions, by reducing water use, facilitating use of non-polluting modes of transportation, facilitating traffic flow, and converting municipal vehicles to low emission or zero emission models. Therefore, these proposed CAP actions are expected to reduce GHG emissions overall, and therefore not to make a considerable contribution to the cumulative effect of GHG emissions on climate change.

Implementation of several proposed CAP actions could result in both construction-related and operations-related GHG emissions. These include Actions 1.5, 2.1, 3.1, 3.6, 4.1 and 4.2. Several of these actions, if implemented, could result in relatively large construction projects, such as development of large-scale renewable energy facilities under Action 2.1; in-fill development and redevelopment within Transit Priority Areas, facilitated by Actions 3.1 and 3.6; and new or expanded wastewater and solid waste processing facilities under Actions 4.1 and 4.2. However, as indicated in the discussion of expected GHG emissions reduction from implementation of the CAP, these actions would also result in substantial long-term reductions in GHG emissions. Therefore, they would not be considered to have the potential to make a considerable contribution to cumulative GHG emissions.

Proposed CAP Action 4.1 Divert Solid Waste and Capture Landfill Emissions, may result in specific measures that change solid waste collection and handling in the City. Supporting measures for this action include a change to weekly collection of recycling and greenwaste and addition of food scraps to the greenwaste collection program. These would result in the increase in the number of weekly collections serving each household or business, and a substantial increase in VMT by collection vehicles, and therefore the potential for increased GHG emissions. Proposed CAP Action 2.3 Conversion of Waste Collection Vehicles to Alternative Fuel would reduce GHG emission rates for collection vehicles, and would offset the increase in collection vehicle VMT. However, the conversion would not be complete until 2035. Furthermore, this action only addresses collection vehicles. Proposed CAP Action 4.1 may also result in the use of new or different waste processing facilities, such as composting facilities, anaerobic digesters, and material recovery facilities. While these facilities would result in reduction of GHG emissions from waste processing relative to landfilling of the same materials, in some instances the haul distance to these facilities from local transfer stations may be longer than the current haul distance. This could result in increased VMT by diesel-powered long-haul trucks and a substantial increase in GHG emissions.

### **Significance of Impact**

As described above, construction and operations associated with implementation of most of the proposed CAP actions may result in GHG emissions, but these emissions would be more than offset by the long-term reductions in GHG emissions that the actions would enable. Therefore, GHG emissions associated with implementation of these actions would not make a considerable contribution to cumulative GHG emissions, and the impact would be less than significant.

Action 4.1 Divert Solid Waste and Capture Landfill Emissions could result in increased GHG emissions from increased VMT by solid waste collection and long-haul vehicles. Action 4.1 would result in 75 percent waste diversion by 2020 and 90 percent waste diversion by 2035. Using the calculation method described in CAP Appendix ~~BA~~, this action would result in a reduction of 154,467 MMT CO<sub>2</sub>e by 2020, ~~283,309 MMT CO<sub>2</sub>e by 2030~~, and 344,213 MMT CO<sub>2</sub>e by 2035. Meanwhile, CAP Action 2.3 would convert the City's waste collection trucks to low emission fuels, which helps offset the potential increase in GHG emissions from the increased VMT by waste collection and long-haul vehicles. For example, if the City was to increase their recycling collection services from once every other week to every week to achieve 90% diversion (a reasonable assumption), then the collection fleet would consume approximately 1.3 million gallons of fuel per year compared to 1 million gallons of fuel per year under the existing waste collection scenario<sup>1</sup>. Without implementation of Action 2.3, this increased fuel use would consist entirely of diesel fuel and the resulting increase in GHG emissions would be 3,383 MT CO<sub>2</sub>e per year over existing conditions for a total of 13,534 MT CO<sub>2</sub>e annually. However, with the conversion of the entire collection fleet to low emission fuels, the GHG emissions increase due to enhanced collection services would be limited to approximately 9.6 MT of CO<sub>2</sub>e annually, which offsets more than 99.7% of the emissions that would result from using diesel fuel.<sup>2</sup>

In conclusion, adoption and implementation of the CAP would result in a net decrease in GHG emissions, both compared to the 2010 baseline and to the BAU projections for 2020, 2030, and 2035. The CAP therefore would not generate GHG emissions that would have a cumulatively significant impact on the environment and the impact would be less than significant.

### Mitigation Framework

No mitigation is required.

### ***Issue 2: 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?***

The CAP is designed to be consistent with the reduction measures and recommendations contained in CARB's AB 32 Scoping Plan. The Pavley Program, Renewable Portfolio Standard, Low Carbon Fuel Standard, SB 375 land use and transportation strategies, energy efficiency measures, solar PV measures, vehicle and fuel efficiency measures, landfill methane capture, and urban forestry practices are all measures in the CARB Scoping Plan that are also included in the CAP.

Following direction provided in the CARB Scoping Plan, as set forth in the CAP, BAU emissions would reach 14.1 MMT CO<sub>2</sub>e by 2020, 15.87 MMT CO<sub>2</sub>e by 2030, and 16.74 MMT CO<sub>2</sub>e by 2035. One of the project objectives for the CAP is to conform to California laws and regulations.

<sup>1</sup> See methodology description in CAP Appendix ~~BA~~, page ~~B-28 to B-29~~ ~~A-39 to A-40~~.

<sup>2</sup> This scenario is intended to illustrate to what extent switching to low-carbon fuels for the solid waste collection fleet may offset an increase in VMT to achieve enhanced waste diversion while also reducing total GHG emissions. The actual increase in VMT and GHG emissions associated with CAP Action 4.1 would be dependent on the combination of waste diversion strategies in the Zero Waste Plan that the City chooses to implement to achieve its 2020 and 2035 goals.

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 ~~11.04~~ MMT CO<sub>2</sub>e. The CAP sets a 2030 target equivalent to 41 percent below the 2010 baseline to comply with Executive Order B-30-15. The CAP sets a 2035 target equivalent to ~~51~~ 10 percent below the 2010 baseline, as an interim target in line with the 2050 target established by Executive Order S-3-05, which call for an 80 percent reduction below 1990 levels. Accordingly, the City’s 2035 target is approximately 6.5 MMT CO<sub>2</sub>e. As shown in **Table 3.D-1**, implementation of the CAP is anticipated to enable the City to exceed its reduction target by ~~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.

As outlined in the Project Description, the City would implement a monitoring plan to ensure that the strategies in the CAP achieve the anticipated GHG reductions.

**TABLE 3.D-1  
ESTIMATED GHG REDUCTION POTENTIAL OF CAP STRATEGIES**

Reductions from	2020 MT CO <sub>2</sub> e	2030	2035 MT CO <sub>2</sub> e
2010 Baseline Emissions	<del>13,019,591</del> <u>12,984,993</u>	<del>13,019,591</del> <u>12,984,993</u>	<del>13,019,591</del> <u>12,984,993</u>
Total Projected Emissions (Business-as-Usual)	<del>14,067,316</del> <u>14,124,690</u>	<del>15,667,449</del> <u>15,856,604</u>	<del>16,427,118</del> <u>16,716,020</u>
Estimated GHG Reductions from CAP	<del>(4,275,421)</del> <u>(4,330,946)</u>	<del>(8,032,274)</del> <u>(8,276,804)</u>	<del>(10,044,459)</del> <u>(10,428,986)</u>
GHG Emissions with Implementation of the CAP	<del>9,791,894</del> <u>9,793,744</u>	<del>7,635,226</del> <u>7,579,800</u>	<del>6,382,659</del> <u>6,287,035</u>
City Target Emissions Levels <sup>1</sup>	<del>11,066,652</del> <u>11,037,244</u>	<del>7,811,754</del> <u>7,790,996</u>	<del>6,509,795</del> <u>6,492,497</u>
<i>Additional Reduction Below Target</i>	<del>(1,274,758)</del> <u>(1,243,500)</u>	<del>(176,528)</del> <u>(211,196)</u>	<del>(127,136)</del> <u>(205,462)</u>

<sup>1</sup> To achieve its proportional share of the state reduction targets for 2020 (AB32), 2030 (EO B-30-15) and 2050 (EO S-3-05), the City would need to reduce emissions below the 2010 baseline by 15 percent in 2020, 40 percent in 2030, and 50 percent by 2035. To meet these goals, the City must implement strategies that reduce emissions to approximately 11 MMT of CO<sub>2</sub>e in 2020, 7.8 MMT CO<sub>2</sub>e in 2030, and 6.5 MMT of CO<sub>2</sub>e in 2035. Implementation of the CAP would accomplish this.

SOURCE: San Diego CAP, 2015

### Significance of Impact

As described above, the CAP would not conflict with the GHG reduction targets established by Executive Order S-3-05, Executive Order B-30-15, and AB 32, or the reduction measures identified in CARB’s AB 32 Scoping Plan ~~32~~; rather, the CAP is consistent with and would implement locally several of the GHG reduction measures contained in the CARB Scoping Plan. In addition, implementation of the CAP would result in the City attaining its share of GHG emissions reductions toward the achievement of the statewide GHG emissions reductions targets. This impact would therefore be less than significant.

### Mitigation Framework

No mitigation is required.

## E. Historical Resources

### E.1 Introduction

This section analyzes potential impacts on historical resources that could result from implementation of the City of San Diego (City) Climate Action Plan (CAP).

### E.2 Environmental Setting

#### Historic Overview

##### *Hispanic Era*

San Diego history can be divided into the Spanish Period (1769-1821), Mexican Period (1821-1846) and American Period (1846-Present). In spite of Juan Cabrillo's earlier landfall on Point Loma in 1542, the Spanish colonization of Alta California did not begin until 1769 with the founding of Mission San Diego de Alcalá by Father Junípero Serra. Concerns over Russian and English interests in California motivated the Spanish government to send an expedition of soldiers, settlers and missionaries to occupy and secure the northwestern borderlands of New Spain through the establishment of a Presidio, Mission, and Pueblo. The Spanish explorers first camped on the shore of the bay in the area that is now downtown San Diego. Lack of water at this location, however, led to moving the camp on May 14, 1769 to a small hill closer to the San Diego River and near the Kumeyaay village of Cosoy. Father Junípero Serra arrived in July of the same year to find the Presidio serving mostly as a hospital. The Spanish built a primitive mission and presidio structure on the hill near the river.

Bad feelings soon developed between the native Kumeyaay and the soldiers, resulting in construction of a stockade which, by 1772, included barracks for the soldiers, a storehouse for supplies, a house for the missionaries and the chapel, which had been improved. The log and brush huts were gradually replaced with buildings made of adobe bricks. Flat earthen roofs were eventually replaced by pitched roofs with rounded roof tiles. Clay floors were eventually lined with fired brick.

In August, 1774 the Spanish missionaries moved the Mission San Diego de Alcalá to its present location six miles up the San Diego River valley (modern Mission Valley) near the Kumeyaay village of Nipaguay. Begun as a thatched chapel and compound built of willow poles, logs and tules, the new Mission was sacked and burned in the Kumeyaay uprising of November 5, 1775. The first adobe chapel was completed in October 1776 and the present church was begun the following year. A succession of building programs through 1813 resulted in the final rectilinear plan that included the church, bell tower, sacristy, courtyard, residential complex, workshops, corrals, gardens and cemetery. Orchards, reservoirs and other agricultural installations were built to the south on the lower San Diego River alluvial terrace and were irrigated by a dam and aqueduct system. The initial Spanish occupation and mission system brought about profound changes in the lives of the Kumeyaay people. Substantial numbers of the coastal Kumeyaay were forcibly brought into the mission or died from introduced diseases.

As early as 1791, presidio commandants in California were given the authority to grant small house lots and garden plots to soldiers and their families and sometime after 1800, soldiers and their families began to move down the hill near the San Diego River. Historian William Smythe noted that Don Blas Aguilar, who was born in 1811, remembered at least 15 such grants below Presidio Hill by 1821, of which only five of these grant lands within the boundaries of what would become Old Town had houses in 1821. These included the retired commandant Francisco Ruiz adobe (now known as the Carrillo Adobe), another building later owned by Henry Fitch on Calhoun Street, the Ybanes and Serrano houses on Juan Street near Washington Street, and a small adobe house on the main plaza owned by Juan Jose Maria Marron.

### ***Mexican Era***

In 1822 the political situation changed as Mexico won its independence from Spain and San Diego became part of the Mexican Republic. The Mexican Government opened California to foreign trade; began issuing private land grants in the early 1820s, creating the rancho system of large agricultural estates; secularized the Spanish missions in 1833; and oversaw the rise of the civilian pueblo. By 1827, as many as 30 homes existed around the central plaza and in 1835, Mexico granted San Diego official pueblo (town) status. At this time the town had a population of nearly 500 residents, later reaching a peak of roughly 600. By 1835 the presidio, once the center of life in Spanish San Diego, had been abandoned and lay in ruins. Mission San Diego de Alcalá fared little better. The town and the ship landing area at La Playa were now the centers of activity in Mexican San Diego. However, the new Pueblo of San Diego did not prosper as did some other California towns during the Mexican Period.

The secularization in San Diego County triggered increased Native American hostilities against the Californios during the late 1830s. The attacks on outlying ranchos, along with unstable political and economic factors helped San Diego's population decline to around 150 permanent residents by 1840. San Diego's official Pueblo status was removed by 1838 and it was made a subprefecture of the Los Angeles Pueblo. When the Americans took over after 1846, the situation had stabilized somewhat, and the population had increased to roughly 350 non-Native American residents. The Native American population continued to decline, as Mexican occupation brought about continued displacement and acculturation of Native American populations.

The American Period began in 1846 when United States military forces occupied San Diego and this period continues today. When United States military forces occupied San Diego in July 1846, the town's residents split on their course of action. Many of the town's leaders sided with the Americans, while other prominent families opposed the United States invasion. In December 1846, a group of Californios under Andres Pico engaged United States Army forces under General Stephen Kearney at the Battle of San Pasqual and inflicted many casualties. However, the Californio resistance was defeated in two small battles near Los Angeles and effectively ended by January 1847. The Americans assumed formal control with the Treaty of Guadalupe-Hidalgo in 1848 and introduced Anglo culture and society, American political institutions and especially American entrepreneurial commerce. In 1850, the Americanization of San Diego began to develop rapidly.

On February 18, 1850, the California State Legislature formally organized San Diego County. The first elections were held at San Diego and La Playa on April 1, 1850 for county officers. San Diego grew slowly during the next decade. San Diegans attempted to develop the town's interests through a transcontinental railroad plan and the development of a new town closer to the bay. The failure of these plans, added to a severe drought which crippled ranching and the onset of the Civil War, left San Diego as a remote frontier town. The troubles led to an actual drop in the town's population from 650 in 1850 to 539 in 1860. Not until land speculator and developer Alonzo Horton arrived in 1867 did San Diego begin to develop fully into an active American town.

### ***American Era***

Alonzo Horton's development of a New San Diego (modern downtown) in 1867 began to swing the community focus away from Old Town and began the urbanization of San Diego. Expansion of trade brought an increase in the availability of building materials. Wood buildings gradually replaced adobe structures. Some of the earliest buildings to be erected in the American Period were "Pre-fab" houses which were built on the east coast of the United States and shipped in sections around Cape Horn and reassembled in San Diego. Development spread from downtown based on a variety of factors, including the availability of potable water and transportation corridors. Factors such as views and access to public facilities affected land values, which in turn affected the character of neighborhoods that developed. During the Victorian Era of the late 1800s and early 1900s, the areas of Golden Hill, Uptown, Banker's Hill and Sherman Heights were developed. Examples of the Victorian Era architectural styles remain in these communities, as well as in Little Italy which developed at the same time. At the time downtown was being built, there began to be summer cottage/retreat development in what are now the Beach communities and La Jolla area. The early structures in these areas were not of substantial construction; they were primarily for temporary vacation housing.

Development also spread to the Greater North Park and Mission Hills areas during the early 1900s. The neighborhoods were built as small lots, a single lot at a time; there was not large tract housing development of those neighborhoods. It provided affordable housing away from the downtown area, and development expanded as transportation improved. Barrio Logan began as a residential area, but because of proximity to rail freight and shipping freight docks, the area became more mixed with conversion to industrial uses. This area was more suitable to industrial uses because land values were not as high; topographically the area is more level, and it is not as interesting in terms of views as are the areas north of downtown. Various ethnic groups settled in the area because of the availability of land ownership.

San Ysidro began to be developed at about the turn of the 20th century. The early settlers were followers of the Littlelanders movement. There, the pattern of development was designed to accommodate small plots of land for each homeowner to farm as part of a farming-residential cooperative community. Nearby Otay Mesa-Nestor began to be developed by farmers of Germanic and Swiss background. Some of the prime citrus groves in California were in the Otay Mesa-Nestor area; in addition, there were grape growers of Italian heritage who settled in the Otay River Valley and tributary canyons and produced wine for commercial purposes.

San Diego State University was established in the 1920s; development of the state college area began then and the development of the Navajo community was outgrowth from the college area and from the west. There was farming and ranching in Mission Valley until the middle portion of the 20th century when the uses were converted to commercial and residential. There were dairy farms and chicken ranches adjacent to the San Diego River where now there are motels, restaurants, office complexes and regional shopping malls. There was little development north of the San Diego River until Linda Vista was developed as military housing in the 1940s. The federal government improved public facilities and extended water and sewer pipelines to the area. From Linda Vista, development spread north of Mission Valley to the Clairemont Mesa and Kearny Mesa areas. Development in these communities was mixed use and residential on moderate size lots.

Tierrasanta, previously owned by the United States Navy was developed in the 1970s. It was one of the first planned unit developments with segregation of uses. Tierrasanta and many of the communities that have developed since, such as Rancho Penasquitos and Rancho Bernardo, represent the typical development pattern in San Diego in the last 25 to 30 years: uses are well segregated with commercial uses located along the main thoroughfares, and the residential uses are located in between. Industrial uses are located in planned industrial parks.

## **Summary of Historic Resources within San Diego**

Historic Resources within San Diego span all eras described above, from the 1769 site of the Presidio of San Diego in Old Town, to the Veterans' War Memorial Building in Balboa Park, constructed in 1950, as well as many in between. They represent a wide variety of architectural styles from various eras in the City's history. The San Diego Historical Resources Board has designated nearly 1,100 historical landmarks within the City, as well as 16 historic districts, including the Old Town Historical District, the Gaslamp Historical District, and the Naval Training Station Historical District. As of 2015, there are nearly 80 historical resources in San Diego that have been formally listed in the NRHP, and 8 National Historical Landmarks, most of which have overlapping designations with the City's historical landmarks (City of San Diego, 2014).

Significant elements of San Diego's historic built environment include railroad and maritime history, development in relationship to the automobile, the role of recreation in the development of specific industries, as well as the design and implementation of major regional planning and landscaping projects. The role of international fairs on architecture, landscape architecture and buildings, and the development of industrial and military technologies between the two world wars, are other significant elements of City history. The relationship between climate, terrain, native plant material and local gardening and horticultural practices; planning and subdivision practices from the turn of the century to the present day; and the post-war period of suburbanization are also historically important.

## E.3 Regulatory Setting

### Federal

The majority of applicable federal regulations concerning cultural resources are established by the National Historic Preservation Act of 1966 (NHPA) and the National Environmental Policy Act of 1969 (NEPA).

#### **National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.)**

A federal law enacted to avoid unnecessary harm to historic properties, NHPA includes regulations that apply specifically to federal land-holding agencies, but also includes regulations (Section 106) which pertain to all “undertakings” funded, permitted, or approved by any federal agency that have the potential to affect cultural resources. Provisions of NHPA establish the National Register of Historic Places (NRHP), the Advisory Council on Historic Preservation, State Historic Preservation Offices, and the federal grants-in-aid programs.

#### **National Environmental Policy Act of 1969 (16 U.S.C. 4321, and 4331-4335, as amended)**

The act establishes guidelines to “preserve important historic, cultural, and natural aspects of our national heritage, and to maintain, wherever possible, an environment that supports diversity and a variety of individual choice.” All federal actions that are subject to NEPA are considered “undertakings” subject to compliance with Section 106 of the NHPA and all NEPA requirements concerning cultural resources.

#### **Secretary of the Interior’s Standards**

The Secretary of the Interior is responsible for establishing professional standards and providing guidance related to the preservation and protection of all cultural resources listed in, or eligible for listing in, the NRHP. The Secretary of the Interior’s Standards for the Treatment of Historic Properties apply to all grants-in-aid projects assisted through the National Historic Preservation Fund, and are intended to be applied to a wide variety of resources, including buildings, structures, sites, objects, and districts. The treatment standards, developed in 1992, are entitled “The Secretary of the Interior’s Standards for the Treatment of Historic Properties” codified as 36 CFR 68. The standards address four treatments:

- **Preservation** means the act or process of applying measures necessary to sustain the existing form, integrity, and materials of a historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses on the ongoing maintenance and repair of historic materials and features, rather than extensive replacement and new construction.
- **Rehabilitation** means the act or process of making possible an efficient compatible use for a property through repair, alterations, and additions while preserving those portions or features that convey its historical, cultural, or architectural values.
- **Restoration** means the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period.



- **Reconstruction** means the act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

In addition, CEQA Section 15064.5(3)(b) states that, “Generally, a project that follows the Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior’s Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource.”

### ***Other Federal Legislation***

Federal historic preservation legislation was initiated by the Antiquities Act of 1906 (16 U.S.C. 431-433) to protect historic and archaeological sites. The law established the procedure for issuing permits to conduct archaeological studies on federal land, as well as setting penalties for noncompliance. Permits are currently issued under this act and the Archeological Resources Protection Act of 1979 (ARPA) (16 U.S.C. 470aa-mm). The purpose of ARPA is to enhance preservation and protection of archaeological resources on public and Native American lands. The Historic Sites Act of 1935 (16 U.S.C. 461-467) states that it is national policy to “preserve for public use historic sites, buildings, and objects of national significance.”

### **National Register of Historic Places**

Archaeological and historical sites can be given a measure of protection if they are eligible for the *NRHP* (36CFR60.4 and 36CFR800). The criterion most often applied to archaeological sites is criterion (4), which addresses the potential of a site to yield information important in prehistory or history. The NRHP criteria and other information issued by the Advisory Council on Historic Preservation, present the legal measures of significance relevant to cultural resources. The NRHP criteria are the following:

The quality of significance in American history, architecture, archaeology, and culture is present in districts, sites, buildings, structures, and objects of state and local importance that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that:

- are associated with events that have made a significant contribution to the broad patterns of our history; or
- are associated with the lives of persons significant in our past; or
- embody the distinctive characteristics of a type, period, method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack distinction; or
- have yielded, or may be likely to yield, information important to prehistory or history [36CFR60.4 (a-d)].

In addition to meeting one or more of NRHP criteria, a cultural resource must retain integrity. To retain historic integrity a property will always possess several, and usually most, of the seven aspects of integrity – Location, Design, Setting, Materials, Workmanship, Feeling and Association. The retention of specific aspects of integrity is paramount for a property to convey its significance. Determining which of these aspects are most important to a particular property requires knowing why, where, and when the property is significant. In reference to archaeological sites, a cultural resource must have sufficient integrity so that available data can be recovered and analyzed in meaningful ways.

## State

### ***Cultural Resources***

#### **California Environmental Quality Act (Public Resources Code 21000 et seq.)(CEQA)**

Under CEQA, a project that would cause a substantial adverse change in the significance of an “historical resource” is a project that may have a significant effect on the environment. (CEQA *Guidelines* Section 15064(b).) An “historical resource” is a resource that meets one of the following criteria (CEQA *Guidelines* Section 15064[a]):

- The resource is listed in or determined eligible for listing in the California Register of Historical Resources.
- The resource is included in a local register of historical resources, as defined in Section 5030.1[k] of the PRC,
- The resource is identified as significant in an historical resource survey meeting the requirements of Section 5024.1[g] of the PRC, unless the preponderance of evidence demonstrates that it is not historically or culturally significant; or
- The lead agency determines the resource to be significant as supported by substantial evidence in light of the whole record.

CEQA also requires consideration of impacts on “unique archeological sites.” (CEQA *Guidelines* Section 15069.5(c)(3).) Most archeological sites that meet the definition of a unique archeological site also meet the definition of an “historical resource.”

#### **California Register of Historical Resources**

On September 27, 1992, Assembly Bill 2881 (Statutes of 1992, Chapter 1075) was signed into law amending the Public Resources Code (PRC) as it affects historical resources (PRC Section 4850 *et seq.*) This legislation, which became effective on January 1, 1993, also created the CRHR. A historical resource must be significant at the local, state, or national level, under one or more of the following four CRHR criteria:

- It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
- It is associated with the lives of persons important to local, California, or national history;

- It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or
- It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation.

Integrity is the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance. All resources nominated for listing on the CRHR must have integrity. Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance.

It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the NRHP, but they may still be eligible for listing in the CRHR. A resource that has lost its historic character or appearance may still have sufficient integrity for the CRHR if it maintains the potential to yield significant scientific or historical information or specific data.

Section 15064.5 of the CEQA *Guidelines* states: "Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, shall be considered as mitigated to a level of less than a significant impact on the historical resource."

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

The Historic Preservation Element of the City's General Plan (2008) contains a number of goals and policies that are intended to guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City. These goals and policies are also intended to improve the quality of the built environment, encourage appreciation for the City's history and culture, maintain the character and identity of communities, and contribute to the City's economic vitality through historic preservation.

The Historical Resources Board (HRB) has been established by the City Council in accordance with the City Charter, Section 43. The Land Development Code sets forth HRB's authority, appointment and terms, meeting conduct, and powers and duties; the designation process including the nomination process, noticing and report requirements, appeals, recordation, amendments or rescission, and nomination of historical resources to state and national registers; and development regulations for historical resources. The purpose of these regulations is to protect, preserve, and, where damaged, restore the historical resources of San Diego. The historical resources regulations require that designated historical resources be preserved unless deviation findings can be made by the decision maker as part of a discretionary permit. Minor alterations consistent with the U.S. Secretary of the Interior's Standards are exempt from the

requirement to obtain a separate permit but must comply with the regulations and associated historical resources guidelines. Chapter 14 also requires review of construction and development permit applications impacting parcels containing structures 45 years old or older to determine whether or not a historical resource may exist on the parcel (SDMC 143.0212.) If a resource may be present and the project proposes a substantial alteration of the potential resource, a site-specific survey is required consistent with the City's Historical Resources Guidelines.

The Historical Resources Guidelines, located in the Land Development Manual, provide property owners, the development community, consultants and the general public explicit guidance for the management of historical resources located within the City's jurisdiction. These guidelines are designed to implement the City's Historical Resources Regulations contained in the Land Development Code (Chapter 14, Division 3, Article 2) in compliance with applicable local, state and federal policies and mandates, including, but not limited to, the City's Progress Guide and General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966. The intent of the guidelines is to ensure consistency in the management of the City's historical resources, including identification, evaluation, preservation/mitigation and development.

According to the Land Development Manual, historical resources include all properties eligible or potentially eligible for the National Register of Historic Places, as well as those that may be significant pursuant to state and local laws and registration programs such as the California Register of Historical Resources or the City of San Diego Historical Resources Register. They include buildings, structures, objects, archaeological sites, districts or landscapes possessing physical evidence of human activities that are typically over 45 years old. Accordingly, a site-specific survey is required for any parcel containing a structure that is more than 45 years old for which a Construction Permit or Development permit is sought.

When significant historical resources are present within a given project area, mitigation to protect the resources is required prior to project implementation. The preferred alternative for mitigating impacts to historical resources is avoidance or preservation in place. If preservation is demonstrated to be infeasible, then alternative measures would be required. Preferred mitigation is to avoid affecting the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource should be taken. Depending upon project impacts, measures can include, but are not limited to:

- a. Preparing a historic resource management plan;
- b. Adding new construction which is compatible in size, scale, materials, color and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric);
- c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation;
- d. Screening incompatible new construction from view through the use of berms, walls and landscaping in keeping with the historic period and character of the resource;
- e. Shielding historic properties from noise generators through the use of sound walls, double glazing and air conditioning; and

- f. Removing industrial pollution at the source of production.

In addition to the City's Municipal Code, the Historic Preservation Element of the General Plan contains a number of goals and polies whose purpose is to guide the preservation, protection, restoration, and rehabilitation of historical and cultural resources and maintain a sense of the City. These goals and policies are also intended to improve the quality of the built environment, encourage appreciation for the City's history and culture, maintain the character and identity of communities, and contribute to the City's economic vitality through historic preservation.

## E.4 Impacts and Mitigation Measures

### Significance Criteria

According to the City of San Diego's CEQA Significance Determination Thresholds, a significant impact with regard to historic resources could occur if implementation of the CAP results in the following:

- An alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic building (including an architecturally significant building), structure, or object or site;
- Any impact to existing religious or sacred uses within the potential impact area; or
- The disturbance of any human remains, including those interred outside of formal cemeteries.

A "substantial adverse change" to an historical resource is defined in Section 15064.5(b)(1) of the CEQA *Guidelines* as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired." The significance of a historical resource is "materially impaired," according to Guidelines Section 15064(b)(2), when a project demolishes or materially alters, in an adverse manner, those physical characteristics of the resource that:

- convey its historic significance and that justify its inclusion in, or eligibility for inclusion in, the CRHR (including a determination by the lead agency that the resource is eligible for inclusion in the CRHR);
- account for its inclusion in a local register of historical resources adopted by local agency ordinance or resolution (in accordance with PRC Section 5020.1(k)); or
- account for its identification in a historical resources survey that meets the requirement of PRC Section 5024.1(g), including, among other things, that "the resource is evaluated and determined by the [State Office of Historic Preservation] to have a significance rating of Category 1 to 5 on DPR Form 523," unless the lead agency "establishes by a preponderance of evidence that the resource is not historically or culturally significant."

The State CEQA *Guidelines* indicate that projects that are consistent with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings

generally “shall be considered as mitigated to a level of less than a significant impact on the historical resource” (Section 15064.5(b)(3)).

## Impact Analysis

As indicated in Table 2-5 in Chapter 2, Project Description, the CAP strategies, actions, and supporting measures that could have an impact on historic resources include:

- **Action 1.1 Residential Energy Conservation and Disclosure Ordinance and Action 2.1 Community Choice Aggregation Program or Similar Program.** These actions could encourage retrofits of existing buildings to increase energy efficiency and install small-scale renewable energy facilities, such as rooftop solar. If this were to occur in historic buildings or districts, it could affect their integrity and ability to convey their historical significance.
- **Actions 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.** These actions would result in in-fill development and redevelopment concentrated in identified Transit Priority Areas. This could result in the demolition or alteration of known historical resources and the accidental discovery and damage to previously unknown cultural resources.

***Issue 1: 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?***

The demolition or substantial alteration of a resource listed on, or formally determined eligible for, the National Register of Historic Places or the California Register of Historical Resources, including contributors to National Register or California Register Historic Districts; or listed on the San Diego Historical Resources Register, including contributors to San Diego Register Historic Districts; or that meet the CEQA criteria for historical resources would represent a significant direct impact to historical resources. Additionally, grading, excavation and other ground disturbing activities associated with development projects that affect significant archaeological sites or traditional cultural properties would represent a significant direct impact to historical resources. While the CAP does not specifically propose demolition or substantial alteration of a resource or ground disturbing activities such as grading or excavation, it can be assumed that implementation of the CAP could have the potential to result in significant direct and/or indirect impacts to historical resources. Any significant impacts are most likely to occur through CAP Action 1.1 Residential Energy Conservation, Benchmarking, and Disclosure Ordinance, which may encourage residential energy efficiency retrofits; and CAP Action 2.1 Community Choice Aggregation Program, which may encourage distributed and large-scale renewable energy facilities. Implementation of the General Plan policies and compliance with the City’s Historical Resources Regulations and guidelines outlined in Section E.3, Regulatory Setting, would serve to reduce impacts to a degree; however, existing legislation, including the California Solar Rights Act, currently limits the City’s ability to require modifications to the placement or design of solar installations on historic and potentially historic resources; thereby increasing the likelihood that such resources may be adversely impacted as a result of solar installations and other retrofit actions.

Impacts to resources associated with the built environment may include substantial alteration, relocation, or demolition of historic buildings, structures, objects, landscapes, and sites. If important archaeological sites occur on property that is proposed for development, construction activities, such as grading and excavation, could result in significant impacts. Archaeological resources may be difficult to detect prior to construction activities, as they are generally located below the ground surface. Most archaeological sites have some surface expression and many have been found within inches of the ground surface. Therefore, the potential to affect important archaeological sites exists if a development activity requires even minimal grading and/or excavation. The likelihood of encountering archaeological resources is greatest on sites that have been minimally excavated in the past (e.g., undeveloped parcels, vacant lots and lots containing surface parking; undeveloped areas around historic buildings; under buildings with post, pier, slab, or shallow wall foundations without basements; etc.). Previously excavated areas are generally considered to have a low potential for archaeological resources, since the soil containing the archaeological resources has been removed. However, under certain circumstances, further evaluation would be required when previously excavated and/or graded project sites are located within areas of known archaeological sensitivity (e.g., recorded sites, designated sites, etc.), or are identified as traditional cultural properties. In addition, building demolition and surface clearance could result in impacts to archaeological resources.

### **Significance of Impact**

Impacts to prehistoric or historic buildings, structures, objects, or sites associated with CAP Action 1.1 Residential Energy Conservation and Disclosure Ordinance (residential energy efficiency retrofits), as well as CAP Action 2.1 Community Choice Aggregation Program or Another Program (which may encourage distributed and large-scale renewable energy facilities), have the potential to be significant.

### **Mitigation Framework**

The City of San Diego's General Plan, combined with federal, state, and local regulations, provide a regulatory framework for developing project-level historical resources mitigation measures for future discretionary projects. All development projects with the potential to affect historical resources—such as designated historical resources; historical buildings, districts, landscapes, objects, and structures; important archaeological sites; and traditional cultural properties—are subject to site-specific review in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines, through the discretionary process. The following Mitigation Framework measure (HIST-1) would be required of all future development projects with the potential to impact significant archaeological resources.

#### **Mitigation Measure HIST-1: Archaeological Resources**

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.

### ***Initial Determination***

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.

**Step 1:** 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 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.

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.

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.

**Step 2:** 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.

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 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.

**Step 3:** 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.

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.

**Step 4:** 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.

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.

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.

**Step 5:** 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.

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

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.

### **Significance after Mitigation**

Implementation of the General Plan policies and compliance with the City's Historical Resources Regulations and guidelines outlined in the Regulatory Setting section would serve to reduce impacts to a degree, but cannot guarantee that all future project level impacts will be avoided or mitigated to a level less than significant. In addition, existing legislation, including the California Solar Rights Act, currently limits the City's ability to require modifications to the placement or design of solar installations on historic and potentially historic resources; thereby increasing the likelihood that such resources may be adversely impacted as a result of solar installations and other retrofit actions. Because the degree of impact and applicability, feasibility, and success of these measures cannot be accurately predicted for each specific project at this time, the program level impact related to historical resources is considered significant and unavoidable.

## F. Transportation and Circulation

### F.1 Introduction

This section analyzes potential transportation impacts that could result from implementation of the City of San Diego (City) Climate Action Plan (CAP).

### F.2 Environmental Setting

San Diego's transportation system provides for the movement of people and goods through a network of highways and roads, public transit, freight railroads, airports, seaports, and intermodal facilities. Local streets, paths and trails serve to provide local access and connections to the regional network. The transportation system provides travel for residents, employees, visitors, and goods movement and creates a system that supports City and regional economic needs. To accommodate the various travel needs, the City's transportation network includes numerous modes of transportation.

The transportation system includes interstate and State highways, local arterial roadways, public transportation systems, nonmotorized transportation facilities, maritime and aviation facilities, and land ports of entry. The roadway system is an interconnected network of interstates, freeways, highways, toll roads, arterial streets, and local streets. This roadway network allows for the movement of private vehicles, commercial vehicles, buses, and heavy trucks. The regional public transit system includes local and regional bus operations, regional and interregional commuter rail services, and light rail service. The freight railroad network includes three freight rail lines serving cargo and goods services.

Nonmotorized transportation facilities generally include walkways and bikeways. Often, facilities such as bikeways share space with roadway facilities. The airport system consists of commercial, general, and military aviation facilities serving passenger, freight, business, recreational, and military needs. Individual components of the regional transportation network are described in the following sections.

#### Streets and Highways

San Diego has a well-developed and relatively uncongested highway system. Four major interstate freeways and six State highways serve the City. The average daily round-trip commute ranks fifth best compared to the 20 largest metropolitan areas in the nation. Since 1980, more than 1,000 miles of streets and highways have been added to the San Diego region. Roadways are categorized into the following street classifications and functions:

**Freeway:** A street that is designed to carry through traffic, and is fully access controlled by grade separations, interchanges, and ramp connections. It normally is maintained by the California State Department of Transportation (Caltrans) and is constructed to State criteria, and varies in width from four to eight or more lanes.

**Prime Arterial:** A street that primarily provides a network connecting vehicles and transit to other primary arterials and to the freeway system. It carries heavy vehicular movement while providing low pedestrian movement and moderate bicycle and transit movements. It has a raised center median, bicycle lanes, street trees, traffic safety street lighting, sidewalks, and no access from abutting property. It may include underground utilities.

**Major Arterial:** A street that primarily provides a network connecting vehicles and transit to other major arterials and primary arterials, and to the freeway system and secondarily providing access to abutting commercial and industrial property. It carries moderate-to-heavy vehicular movement, low-to-high pedestrian and bicycle movements, and moderate-to-high transit movement. It has a raised center median, street trees, traffic safety, street lighting, and sidewalks, and may include landscaping, pedestrian-scale lighting, underground utilities, on-street parking, and/or bike lanes.

**Collector Street:** A street that primarily provides movement between local/collector streets and streets of higher classification and, secondarily, provides access to abutting property. It carries low- to moderate-vehicular movement, low- to heavy-pedestrian movement, moderate- to heavy-bicycle movement, and low- to moderate-transit movement. It has on-street parking, street trees, traffic safety street lighting, and sidewalks. It may also include landscaping, pedestrian-scale lighting, and underground utilities.

**Local Street:** A street that provides, primarily, direct access to abutting property. It carries low vehicular movement, low- to heavy-pedestrian movement, and low- to moderate-bicycle movement. It has on-street parking, street trees, traffic safety street lighting, and sidewalks. It may include landscaping, pedestrian-scale lighting, and underground utilities.

## Bikeways

The City of San Diego has a developed network of designated Class I, II, and III bikeways. In San Diego, many Class I bikeways provide critical links between communities that would otherwise be totally separated for bicyclists. Two examples of these critical links are the Rose Canyon and Murphy Canyon paths, which provide for convenient bicycle travel in areas with no other alternative route adjacent to busy freeways. Most of the Class II bike lane facilities are located in areas of the City developed within the last 30 years, and some are of significant length. Class III bikeways are located both along major arterials and along quiet neighborhood streets.

**Table 3.F-1** presents the existing bikeways in San Diego by classification.

The City of San Diego is committed to supporting bicycling as a form of mobility and recreation. As part of the City's long-term vision contained in the General Plan, the City supports the planning and development of bicycle-friendly development projects, streets, and neighborhoods for both commuter and recreational riders. To this end, the City has adopted a citywide Bicycle Master Plan (BMP), which guides development, maintenance, and support of the bicycle network, identifies existing and future needs, and provides specific recommendations for facilities and programs over the next 20 years. The BMP contains detailed policies, action items, and network maps, and addresses issues such as bikeway planning, community involvement, facility design, bikeway classifications, multimodal integration, safety and education, and support facilities. The BMP also identifies specific bicycling programs and addresses network implementation, maintenance and funding strategies.

**TABLE 3.F-1  
CLASSIFICATION AND EXISTING BIKEWAYS IN SAN DIEGO**

<b>Classification</b>	<b>Definition</b>	<b>Existing Facilities</b>
Class I (Bike Path)	Consists of a paved right-of way completely separated from any street or highway.	Mission Valley, Mission Bay Park, along the beachfronts in Pacific Beach and Mission Beach, Carmel Valley, Rancho Peñasquitos, Mira Mesa, Rose Canyon, near the San Diego Airport, and in the Mission Trails Park
Class II (Bike Lane)	Provides a striped and stenciled lane for one-way travel on a street or highway; helps improve the visibility of bicyclists.	Rancho Bernardo, Rancho Peñasquitos, Sabre Springs, Mira Mesa, University City, Carmel Valley, and Tierrasanta, Genesee Avenue, Linda Vista, Kearny Villa, and Black Mountain Roads, Aero and Harbor Drives, Friars and Mission Gorge Roads, Nimitz and Beyer Boulevards, and Carmel Mountain, Torrey Pines, and Otay Mesa Roads
Class III (Bike Route)	Provides for shared use with pedestrian or motor vehicle traffic and is identified only by signage; recommended when there is enough right-of-way for bicyclists and motorists to safely pass.	Miramar Road, Rancho Peñasquitos Boulevard, Pacific Highway, 4th, 5th, and 6th Avenues, Camino Ruiz, and Saturn and Del Sol Boulevards, Orange Avenue in City Heights, Gold Coast Drive in Mira Mesa, Fort Stockton Drive in Mission Hills, Hornblend Avenue in Pacific Beach, L Street near Golden Hill, and Iris Avenue in Otay Mesa-Nestor
Freeway Shoulder	Locations along freeway shoulder where Caltrans permits bike use.	I-5, SR 52
Bicycle Boulevard	Local roads or residential streets that have been enhanced with traffic calming and other treatments to facilitate safe and convenient bicycle travel. Accommodate bicyclists and motorists in the same travel lanes, without specific vehicle or bicycle lane delineation. Prioritize bicycle travel above vehicular travel. Not recognized by Caltrans Highway Design Manual.	New Classification
Cycle Track	Hybrid type bicycle facility that combines the experience of a separated path with the on-street infrastructure of a conventional Bike Lane.  Located in roadway right-of-ways but separated from vehicle lanes by physical barriers or buffers. Provide for one-way bicycle travel in each direction adjacent to vehicular travel lanes and are exclusively for bicycle use. Not recognized by Caltrans Highway Design Manual.	New Classification

SOURCE: General Plan PEIR, 2008; Bicycle Master Plan, 2013.

## Transit

Transit services are provided for trips within the City and region and for trips between San Diego and adjacent areas. The current transit network includes local and express bus, light rail (trolley), and Coaster commuter rail services. Within the San Diego region, transit services are provided by the Metropolitan Transit System (MTS) in the southern metropolitan area (including the City of San Diego) and the North County Transit District (NCTD) in the northern part of the county (with Coaster and bus services that tie into the City of San Diego). Ferry service (privately operated)

also is available between San Diego and Coronado. In addition, there are demand-responsive transit services that provide transit service in sparsely traveled areas and for travelers with special needs that cannot be well served by fixed-route service.

The Coaster and Amtrak trains provide passenger rail service to the City of San Diego along the coastal rail corridor. Passenger and freight trains also share the predominately single-track corridor.

Transit service in the City includes the following (San Diego, 2011):

- The San Diego Trolley system operates over 53.5 miles on three routes with 53 stations on the Blue Line, Orange Line, and Green Line. The trolley connects the City with East San Diego County, San Diego State University, Qualcomm Stadium, Old Town, Downtown, and the Mexican Border. A new trolley extension is planned to extend service to UC San Diego and La Jolla.
- Passenger rail service is provided by Amtrak, Metrolink, and Coaster commuter trains. Amtrak operates ten trains to San Diego. The Coaster operates during peak hours connecting San Diego County coastal cities. More than 20 trains run on weekdays, with service on Saturdays. In March 2008, North County Transit District launched its newest addition, the east-west Sprinter light-rail train system between Oceanside, Vista, San Marcos and Escondido. The 22-mile long rail system runs east-west - along the Highway 78 corridor - serving 15 stations.
- The California High Speed Rail is planned to pass through San Diego and a trip from San Diego to Los Angeles would be approximately 80 minutes.
- The Metropolitan Transit System operates 29 bus routes covering 635 miles.

## F.3 Regulatory Setting

This section identifies the laws, regulations, policies, and programs related to the physical environment that pertain to the Project's effects on transportation and circulation on the highways and local roadways within San Diego County.

### Federal

#### ***MAP-21***

The Moving Ahead for Progress in the 21st Century Act (MAP-21) was passed by Congress on June 29, 2012, and signed into law by President Obama on July 6, 2012. MAP-21 provides \$105 billion in funding for surface transportation programs for fiscal years 2013 and 2014. This law replaced the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), which was passed in 2005 and extended ten times.

Federal highway standards are implemented in California by Caltrans (see discussion under "State" below).

## **State**

Caltrans is responsible for planning, designing, constructing, and maintaining all State-owned and -operated roadways in San Diego County. Any improvements or modifications to the State highway system within San Diego County must be approved by Caltrans. San Diego County and other local agencies have no ability to unilaterally make improvements to the State highway system.

### ***California Complete Streets Act of 2008***

This law requires cities and counties to include complete streets policies as part of their general plans so that roadways are designed to safely accommodate all users, including bicyclists, pedestrians, transit riders, children, the elderly, and persons with disabilities, as well as motorists. This Act will complement an existing policy, which directs Caltrans to “fully consider the needs of non-motorized travelers (including pedestrians, bicyclists, and persons with disabilities) in all programming, planning, maintenance, construction, operations and project development activities and products.” As of January 2011, any substantive revision of the circulation element in the general plan of a California local government must include complete streets provisions.

### ***California Transportation Development Act (TDA)***

The California TDA provides a dedicated State funding source for use by local jurisdictions at the county level to improve existing public transportation and encourage regional public transportation coordination. Transit agency audits are performed on a triennial basis to ensure that transit agencies are meeting minimum service performance standards (e.g., passengers per revenue mile and hour, annual passengers served etc.). Use of TDA monies is also tied to identifying and allocating funds to unmet transit needs, a process that requires local transportation planning agencies to identify and assess unmet transit needs on an annual basis. Unmet transit needs are defined in the Regional Transportation Plan (RTP) as transit service to those residents who use or would use public transportation regularly, if available, to meet their life expectations, such as trips for medical and dental services, shopping, employment, personal business, education, social services, and recreation. TDA funds can be allocated to non-transit uses if there are no unmet transit needs within the jurisdiction that are reasonable to meet with the use of TDA funds. Reasonableness is determined by community interest, equity, potential ridership, cost effectiveness, operational feasibility, and funding.

### ***California Air Resources Board (CARB)***

CARB, a part of the California EPA (Cal/EPA), is responsible for the coordination and administration of both federal and State air pollution control programs within California. With respect to transportation the California Air Resources Board reviews and approves metropolitan planning organizations (MPOs) implementation of Senate Bill 375 (SB 375) within each region of California.

### ***Senate Bill 375***

SB 375, which establishes mechanisms for the development of regional targets for reducing passenger vehicle greenhouse gas (GHG) emissions, was adopted by the State on September 30,



2008. On September 23, 2010, CARB adopted the vehicular GHG emissions reduction targets that had been developed in consultation with the MPOs; the targets require a seven to eight percent reduction by 2020 and between 13 to 16 percent reduction by 2035 for each MPO. SB 375 recognizes the importance of achieving significant GHG reductions by working with cities and counties to change land use patterns and improve transportation alternatives. Through the SB 375 process, MPOs will work with local jurisdictions in the development of sustainable communities strategies (SCS) designed to integrate development patterns and the transportation network in a way that reduces GHG emissions while meeting housing needs and other regional planning objectives.

## **Regional**

### ***Congestion Management Program (CMP)***

The CMP is the State legislature's effort to reduce congestion on highways and local regionally significant roadways in California (Government Code Section 65089). It includes a land use analysis program to address regional transportation impacts of local land use decisions. It stipulates that a two-tiered review of affected CMP roadways must be completed for proposed residential, commercial, retail, and industrial development in the county. The first tier is a qualitative assessment of consistency with the designated Congestion Management Agency (in this case, SANDAG) regional planning documents and initiatives. The second tier determines whether the development project generates 125 or more peak-hour trips or 500 or more daily trips. Development projects that meet the tier two requirements must be evaluated for significant impacts per the CMP significance criteria under CEQA. Specific projects excluded from this requirement are high-density residential and mixed-use projects within one-quarter mile of a fixed-rail passenger station and low-income housing.

### ***San Diego Association of Governments (SANDAG)***

SANDAG serves as a forum for public decision making on regional issues such as growth, transportation, and land use in San Diego County and is comprised of representatives from each of the county's local jurisdictions, including the City of San Diego. SANDAG programs such as the Regional Comprehensive Plan (RCP) and RTP are pertinent to the City of San Diego's General Plan efforts.

### ***SANDAG 2050 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS)***

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 reflects a region-specific, balanced multimodal plan that achieves the intent 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.

## **City of San Diego General Plan**

The following policies from the Mobility Element of the City of San Diego General Plan, adopted 2008, are applicable to transportation and circulation.

### **Walkable Communities**

- ME-A.1 Design and operate sidewalks, streets, and intersections to emphasize pedestrian safety and comfort through a variety of street design and traffic management solutions, including but not limited to those described in the Pedestrian Improvements Toolbox, Table ME-1.
- ME-A.2 Design and implement safe pedestrian routes.
- a. Collaborate with appropriate community groups, and other interested private and public sector groups or individuals to design and implement safe pedestrian routes to schools, transit, and other highly frequented destinations. Implement needed improvements and programs such as wider and non-contiguous sidewalks, more visible pedestrian crossings, traffic enforcement, traffic calming, street and pedestrian lighting, pedestrian trails, and educating children on traffic and bicycle safety.
  - b. Promote “Walking School Bus” efforts where parents or other responsible adults share the responsibility of escorting children to and from school by foot or bicycle.
  - c. When new schools are planned, work with school districts and affected communities to locate schools so that the number of students who can walk to school safely is maximized.
  - d. Implement Crime Prevention Through Environmental Design (CPTED) measures to reduce the threat and incidence of crime in the pedestrian environment (see also Urban Design Element, Policy UD-A.17).
  - e. Ensure that there are adequate law enforcement, code enforcement, and litter and graffiti control to maintain safe and attractive neighborhoods.
  - f. Provide adequate levels of lighting for pedestrian safety and comfort.
- ME-A.3 Engage in a public education campaign to increase drivers’ awareness of pedestrians and bicyclists, and to encourage more courteous driving.
- ME-A.4 Make sidewalks and street crossings accessible to pedestrians of all abilities.
- a. Meet or exceed all federal and State requirements.
  - b. Provide special attention to the needs of children, the elderly, and people with disabilities.
  - c. Maintain pedestrian facilities to be free of damage or trip hazards.
- ME-A.5 Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage.
- a. Minimize obstructions and barriers that inhibit pedestrian circulation.

- b. Consider pedestrian impacts when designing the width and number of driveways within a street segment.

ME-A.6 Work toward achieving a complete, functional and interconnected pedestrian network.

- a. Ensure that pedestrian facilities such as sidewalks, trails, bridges, pedestrian-oriented and street lighting, ramps, stairways and other facilities are implemented as needed to support pedestrian circulation. Additional examples of pedestrian facilities are provided in the Pedestrian Improvements Toolbox, Table ME-1.
  - 1. Close gaps in the sidewalk network.
  - 2. Provide convenient pedestrian connections between land uses, including shortcuts where possible.
  - 3. Design grading plans to provide convenient and accessible pedestrian connections from new development to adjacent uses and streets.
- b. Link sidewalks, pedestrian paths and multi-purpose trails into a continuous region wide network where possible (see also Recreation Element, Policy RE-D.6).
- c. Provide and maintain trash and recycling receptacles, and restrooms available to the public where needed.
- d. Address pedestrian needs as an integral component of community and public facilities financing plan updates and amendments, other planning studies and programs, and the development project review process.
- e. Routinely accommodate pedestrian facilities and amenities into private and public plans and projects.

ME-A.7 Improve walkability through the pedestrian-oriented design of public and private projects in areas where higher levels of pedestrian activity are present or desired.

- a. Enhance streets and other public rights-of-way with amenities such as street trees, benches, plazas, public art or other measures including, but not limited to those described in the Pedestrian Improvement Toolbox, Table ME-1 (see also Urban Design Element, Policy UD-A.10).
- b. Design site plans and structures with pedestrian-oriented features (see also Urban Design Element, Policies UD-A.6, UD-B.4, and UD-C.6).
- c. Encourage the use of non-contiguous sidewalk design where appropriate to help separate pedestrians from auto traffic. In some areas, contiguous sidewalks with trees planted in grates adjacent to the street may be a preferable design.
- d. Enhance alleys as secure pathways to provide additional pedestrian connections.
- e. Implement traffic calming measures to improve walkability in accordance with Policy ME-C.5.
- f. When existing sidewalks are repaired or replaced, take care to retain sidewalk stamps and imprints that are indicators of the age of a particular neighborhood, or that contribute to the historic character of a neighborhood.

- ME-A.8 Encourage a mix of uses in villages, commercial centers, transit corridors, employment centers and other areas as identified in community plans so that it is possible for a greater number of short trips to be made by walking.
- ME-A.9 Continue to collaborate with regional agencies, school districts, community planning groups, community activists, public health professionals, developers, law and code enforcement officials, and others, to better realize the mobility, environmental, social, and health benefits of walkable communities.

### **Transit First**

- ME-B.1 Work closely with regional agencies and others to increase transit ridership and mode share through increased transit service accessibility, frequency, connectivity, and availability.
- a. Develop an urban network of routes that operate with a base, mid-day service frequency of ten-minute intervals or better.
  - b. Provide transit routes that offer efficient connections between highly frequented origins and destinations.
  - c. Enhance overall transit customer experience through attention to safety, station areas, vehicles, seating, and other factors.
- ME-B.2 Support the provision of higher-frequency transit service and capital investments to benefit higher-density residential or mixed-use areas; higher-intensity employment areas and activity centers; and community plan-identified neighborhood, community, and urban villages; and transit-oriented development areas.
- ME-B.3 Design and locate transit stops/stations to provide convenient access to high activity/density areas, respect neighborhood and activity center character, implement community plan recommendations, enhance the users' personal experience of each neighborhood/center, and contain comfortable walk and wait environments for customers (see also Urban Design Element, Policy UD-A.9).
- ME-B.4 Collaborate with regional agencies to evaluate the need for, and design of, park-and-ride spaces at transit stations based on the character of the neighborhood, community plan recommendations, and the stations role in the regional transit system (see also Urban Design Element, Policies UD-A.11 and UD-A.12).
- ME-B.5 Integrate the regional transit system with the intercity rail network.
- ME-B.6 Work closely with regional agencies to achieve a transit system that is accessible to persons with disabilities.
- ME-B.7 Support efforts to develop additional transportation options for non-driving older adults and persons with disabilities, including:
- Expansion of the regional database of public and private/nonprofit transportation providers;
  - Development of innovative programs to link a wide range of transportation providers with persons in need; and
  - Identification of transportation providers and programs that could assist in evacuating persons in need, as a part of emergency and disaster preparedness

plans that are referenced in the Public Facilities Element, Section P (see also Land Use Element, Policy LU-I.10).

- ME-B.8 Support efforts to use alternative fuels in transit vehicles to help implement air quality and energy conservation goals.
- ME-B.9 Make transit planning an integral component of long range planning documents and the development review process.
- a. Identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process.
  - b. Plan for transit-supportive villages, transit corridors, and other higher-intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with Land Use and Community Planning Element, Sections A and C.
  - c. Proactively seek reservations or dedications of right-of-way along transit routes and stations through the planning and development review process.
  - d. Locate new public facilities that generate large numbers of person trips, such as libraries, community service centers, and some recreational facilities in areas with existing or planned transit access.
  - e. Design for walkability in accordance with the Urban Design Element, as pedestrian supportive design also helps create a transit supportive environment.
  - f. Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.
- ME-B.10 Implement transit priority measures to help bypass congested areas. Priority measures include, but are not limited to, transit signal priority, queue jumpers, exclusive transit lanes, transit ways, use of freeway shoulders, and direct access ramps to freeway High Occupancy Vehicle (HOV) facilities.

### **Street and Freeway System**

- ME-C.2e Provide rights-of-way for designated HOV facilities and transit facilities on City streets where feasible.
- ME-C.4c Encourage community participation in planning, assessing, and prioritizing the life cycle management of the circulation system.

### **Transportation Demand Management**

- ME-E.1 Support and implement TDM strategies including, but not limited to: alternative modes of transportation, alternative work schedules, and telework.
- ME-E.2 Maintain and enhance personal mobility options by supporting public and private transportation projects that will facilitate the implementation of Transportation Demand Management (TDM) strategies.
- ME-E.3 Emphasize the movement of people rather than vehicles.
- ME-E.4 Promote the most efficient use of the City's existing transportation network.

- ME-E.5 Support SANDAG's efforts to market TDM benefits to employers and identify strategies to reduce peak period employee commute trips.
- ME-E.6 Require new development to have site designs and on-site amenities that support alternative modes of transportation. Emphasize pedestrian and bicycle-friendly design, accessibility to transit, and provision of amenities that are supportive and conducive to implementing TDM strategies such as car sharing vehicles and parking spaces, bike lockers, preferred rideshare parking, showers and lockers, on-site food service, and child care, where appropriate.
- ME-E.7 Consider TDM programs with achievable trip reduction goals as partial mitigation for development project traffic and air quality impacts.
- ME-E.8 Monitor implementation of TDM programs to ensure effectiveness.

### **Bicycling**

- ME-F.2 Identify and implement a network of bikeways that are feasible, fundable, and serve bicyclists' needs, especially for travel to employment centers, village centers, schools, commercial districts, transit stations, and institutions.
- a. Develop a bikeway network that is continuous, closes gaps in the existing system, improves safety, and serves important destinations.
  - b. Implement bicycle facilities based on a priority program that considers existing deficiencies, safety, commuting needs, connectivity of routes, and community input.
  - c. Recognize that bicyclists use all City roadways.
    1. Design future roadways to accommodate bicycle travel; and
    2. Upgrade existing roadways to enhance bicycle travel, where feasible.
- ME-F.4 Provide safe, convenient, and adequate short- and long-term bicycle parking facilities and other bicycle amenities for employment, retail, multifamily housing, schools and colleges, and transit facility uses.
- a. Continue to require bicycle parking in commercial and multiple unit residential zones.
  - b. Provide bicycle facilities and amenities to help reduce the number of vehicle trips.
- ME-F.5 Increase the number of bicycle-transit trips by coordinating with transit agencies to provide safe routes to transit stops and stations, to provide secure bicycle parking facilities, and to accommodate bicycles on transit vehicles.

## F.4 Impacts and Mitigation Measures

### Significance Criteria

According to the City of San Diego's CEQA Significance Determination Thresholds (City of San Diego, 2011), a significant impact with regard to transportation and circulation could occur if implementation of the CAP results in the following:

- Result in traffic generation in excess of specific community plan allocation;
- Result in an increase in projected traffic which is substantial in relation to the existing traffic load and capacity of the street system;
- Result in the addition of a substantial amount of traffic to a congested freeway segment, interchange, or ramp as shown in the table on the next page;
- Result in an increased demand for off-site parking;
- Result in effects on existing parking;
- Result in a substantial impact upon existing or planned transportation systems;
- Result in substantial alterations to present circulation movements including effects on existing public access to beaches, parks, or other open space areas;
- Result in an increase in traffic hazards for motor vehicles, bicyclists or pedestrians due to a proposed, non-standard design feature (e.g., poor sight distance or driveway onto an access-restricted roadway); or
- Result in a conflict with adopted policies, plans or programs supporting alternative transportation models (e.g., bus turnouts, bicycle racks).

### Impact Analysis

Several of the proposed CAP strategies and actions have the potential to affect transportation and circulation, by facilitating or promoting development or redevelopment that could alter existing roadways and traffic circulations patterns. Many of the proposed CAP strategies are aimed at decreasing use of automobiles as a transportation mode and promoting alternative modes, including walking, bicycling, and transit. Among those proposed CAP Actions that could affect transportation, many would only have the potential for an adverse effect during construction, when transportation systems and circulation movements could be temporarily disrupted.

- **Action 1.5 Outdoor Landscaping Ordinance.** This action could result in construction-related effects to transportation due to the 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, and/or monitoring systems.
- **Action 2.1 Community Choice Aggregation Program.** This action would promote the construction of distributed generation (small-scale renewables) on new and existing buildings, including solar photovoltaics, wind-turbines, and energy storage systems. This action may also result in the construction of large-scale renewable energy generation systems

within or outside of the City to satisfy a large demand for renewable energy. The construction and operation of such facilities could have an effect on transportation.

- **Action 2.2 Municipal Zero Emissions Vehicles.** This action would result in generally minor construction-related effects to transportation within the built environment associated with development of electrical charging and other fueling infrastructure.
- **Action 2.3 Convert Municipal Waste Collection Trucks to Low Emission Fuel.** This action would result in generally minor construction-related effects to transportation within the built environment associated with development of fueling infrastructure.
- **Action 3.1 Implement General Plan Mobility Element and City of Villages Strategy in Transit Priority Areas.** This action would facilitate implementation of existing City policies that could result in construction-related effects to transportation due to the development of new and extended mass transit infrastructure and service.
- **Action 3.2 Implement the City's Pedestrian Master Plan in Transit Priority Areas.** This action could result in construction-related effects to transportation due to 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.
- **Action 3.3 Implement the City's Bicycle Master Plan.** This action would facilitate implementation of the City's Bicycle Master Plan, which would include renovations and retrofits of existing bike lanes and construction of new bike lanes and facilities.
- **Action 3.4 Implement a Traffic Signal Master Plan.** This action would result in generally minor construction-related effects to transportation while traffic signals are reprogrammed.
- **Action 3.5 Implement a Roundabouts Master Plan.** This action would result in generally minor construction-related effects and operational changes to transportation through changes in the streetscape.
- **Action 3.6 Implement Transit-Oriented Development within Transit Priority Areas.** This action would facilitate implementation of the City of Villages strategy, which could result in construction-related and operational effects on the transportation system and circulation.
- **Action 4.1 Divert Solid Waste and Capture Landfill Emissions.** This action would result in construction-related effects to transportation through the construction of new, or expansions of existing waste processing facilities, as well as new or expanded waste collection programs, and may result in long-term operational impacts.
- **Action 4.2 Capture Methane from Wastewater Treatment.** This action could result in construction-related effects to transportation during the construction of new or expanded wastewater treatment facilities, such as anaerobic digesters, and may result in long-term operational impacts.

***Issue 1: Would implementation of the CAP result in a substantial impact upon existing or planned transportation systems?***

The CAP includes strategies and actions intended to reduce dependence on the automobile and promote and facilitate the use of alternative modes of transportation, including bicycling,



walking, and transit. This shift is anticipated in the General Plan and SANDAG Regional Transportation Plan, and so these CAP actions are consistent with planned transportation systems. Several CAP actions (see the list, above), such as energy efficiency, renewable energy, urban forestry, and others, may result in temporary or limited disruption or alteration of transportation patterns during project construction, but would not substantially alter existing or planned transportation systems. Proposed CAP Action 3.4 Implement a Traffic Signal Master Plan and Action 3.5 Implement a Roundabouts Master Plan would improve traffic flow. These two latter actions would alter the transportation system, but are intended to facilitate traffic flow, and are not expected to result in adverse effects to transportation systems.

Proposed Action 3.2: Implement the City's Pedestrian Master Plan in Transit Priority Areas, and Action 3.3: Implement the City's Bicycle Master Plan, encourage and facilitate implementation of existing City policies, which have already been subjected to environmental review in the Final Program Environmental Impact Report for the City's 2008 General Plan update (General Plan PEIR) and the Bicycle Master Plan Update EIR. The Bicycle Master Plan Update EIR identified a potentially significant impact of plan implementation on traffic and circulation, related to the removal or alteration of vehicle travel lanes along some roadway segments and intersections. Specified mitigation measures would avoid or reduce some impacts, but the Bicycle Master Plan Update EIR concludes that in some instances, significant impacts could be unavoidable.

Proposed CAP Actions 3.1 and 3.6 would facilitate implementation of the General Plan's City of Villages strategy and Mobility Element, which would result in major changes to urban form, including transportation systems, particularly within the Transit Priority Areas. The General Plan PEIR notes the many planned improvements to the transportation and circulation system that would be undertaken through implementation of the City of Villages strategy and Mobility Element, including greater emphasis on alternative transportation modes, will generally lead to better traffic conditions in the City by the year 2030. However, the General Plan PEIR concludes that some projects undertaken pursuant to and consistent with General Plan policies, including the City of Villages strategy and Mobility Element, may adversely affect existing transportation systems. The General Plan PEIR includes a mitigation framework that would be applied to individual projects and would reduce many transportation and circulation impacts of these projects, but the General Plan PEIR concludes that the effectiveness of mitigation measures cannot be ascertained at the program level, and that there is still the potential for significant and unavoidable impacts.

### **Significance of Impact**

As discussed above, the General Plan PEIR identified the potential for significant unavoidable impacts to traffic associated with implementation of the City of Villages strategy. While several of the CAP actions, particularly Action 3.4 Implement a Traffic Signal Master Plan and Action 3.5 Implement a Roundabouts Master Plan would improve traffic flow, they may not be completely effective in reducing or avoiding the impacts to transportation systems associated with the City of Villages strategy.

Other proposed CAP actions would tend to improve the transportation system or would have only temporally and spatially limited effects, which would be considered less than significant. No mitigation is required.

***Issue 2: 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?***

As noted above, implementation of several of the proposed CAP actions would involve construction that could affect present circulation patterns. These effects would be temporary, and can generally be minimized through project planning, scheduling, and temporary signage. Existing regulations require development of a construction traffic management plan for projects that could disrupt traffic flow. With the exception of major projects such as major infill development and redevelopment within TPAs and the construction of major infrastructure facilities (discussed below), the effects of construction-related proposed CAP actions on circulation movements would not be substantial.

Implementation of the City of Villages strategy and General Plan Mobility Element, as facilitated by CAP Actions 3.1 through 3.6, would result in a major change in urban form and a shift to greater use of alternative transportation modes. These changes may result in changes to circulation systems and circulation movements within and around the TPAs, including the potential for the following effects:

- reduced LOS at some intersections and roadways, particularly in TPAs where new development is concentrated;
- 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;
- changes in roadway design, including implementation of CAP Action 3.5 Implement a Roundabouts Master Plan. This action would install roundabouts at 15 intersections by 2020 and an additional 20 intersections by 2035. While roundabouts tend to improve traffic flow, they may, in some instances, result in increased safety hazards for pedestrians by eliminating signalized pedestrian crossings and routing traffic closer to crosswalks;
- development of facilities for bicycles, pedestrians, and mass transit that may “borrow” transportation space from existing automobile-oriented roadways, resulting in reduced LOS and increased congestion.

As noted in the discussion of Issue 1, above, The General Plan PEIR notes the many planned improvements to the transportation and circulation system that would be undertaken through implementation of the City of Villages strategy and Mobility Element, including greater emphasis on alternative transportation modes, will generally lead to better traffic conditions in the City by the year 2030. However, the General Plan PEIR concludes that some projects undertaken pursuant to and consistent with General Plan policies, including the City of Villages strategy and Mobility Element, may adversely affect existing transportation systems. The General Plan PEIR includes a mitigation framework that would be applied to individual projects and would reduce

many transportation and circulation impacts of these projects, but the General Plan PEIR concludes that the effectiveness of mitigation measures cannot be ascertained at the program level, and that there is still the potential for significant and unavoidable impacts. Also as discussed under Issue 1, the Bicycle Master Plan Update EIR recognizes the potential for significant unavoidable impacts associated with development of bicycle lanes and bicycle paths, where these would require the removal or alteration of vehicle travel lanes along some roadway segments and intersections.

Proposed CAP Action 1.5 Outdoor Landscaping Ordinance, Action 2.1 Community Choice Aggregation Program, Action 4.1 Divert Solid Waste and Capture Landfill Emissions, and Action 4.2 Capture Methane from Wastewater Treatment all could result in the development of major new or expanded infrastructure facilities, including large-scale renewable energy facilities, recycled water plants, solid waste processing and recovery facilities, and wastewater treatment facilities. These projects could result in short-term construction-related alterations to circulation systems, and could also, in some instances, permanently alter circulation systems, for example, by redeveloping industrial sites that would result in changes to existing roadways. While projects of this type and scale will need to be examined at the project level, project locations will generally be within existing facility footprints or industrial areas, which typically have relatively low traffic density. For large-scale renewable energy facilities proposed to be located within the City, application of Mitigation Measure LU-1 (see Section 3.A, Land Use) which would establish a screening process for ensuring consideration of site adjacencies and compatibilities, would screen for potential impacts to circulation movements.

Proposed CAP Action 2.1 may also encourage or facilitate the development of larger renewable energy systems outside of the City limits. Such development could occur on private or public lands, but would likely be in relatively undeveloped areas with low intensity of use. Thus, there is little potential for construction and operation of these facilities to impact circulation movements, even though they may result in short-term increases in traffic during construction and long term increases in traffic during operation. In any event, it would be the responsibility of the agency with land use authority over the project site to ensure that developments would not adversely affect local circulation movements, which may occur through a CEQA review process conducted by the local land use authority. Therefore, impacts to circulation movements would likely not occur. In any case, traffic impacts of any renewable energy facilities proposed for development outside of the City will be considered in the planning and environmental review process for proposed facilities. Since the exact nature of any impacts cannot be known at this time, effective mitigation cannot be determined at this time

Proposed CAP Action 4.1 Divert Solid Waste and Capture Landfill Emissions would include changes to existing solid waste collection programs, specifically a change to weekly collection of organic materials and recycling. This may result in an increased number of solid waste collection vehicles entering neighborhoods to collect waste materials. In any given location in the City, this change may result in one or two additional collection vehicles per week. This level of increase may result in minor inconveniences for residents and businesses, but would not constitute a substantial change to circulation movements, and therefore would not be significant. However,

the overall increase in the number of collection vehicles required to implement the more frequent collection service may result in substantial additions of trucks accessing transfer stations and materials recovery facilities and other waste recovery facilities. In some instances, this increase could adversely and substantially affect circulation movements in and around these facilities. However, the CAP contains no specific proposal for new or expanded waste handling facilities. It would, therefore, be speculative to assume that development of such facilities would cause a significant impact on transportation and circulation. Since new and substantially altered solid waste facilities are projects subject to environmental review under CEQA, potential impacts on traffic and circulation would be evaluated at the time that specific projects are proposed.

### **Significance of Impact**

As discussed above, implementation of the City of Villages strategy, including redevelopment within TPAs and the planned shift in transportation modes has the potential to result in significant adverse impacts on traffic and circulation. These impacts have been analyzed in other CEQA documents, including the General Plan PEIR and the Bicycle Master Plan Update EIR. Proposed CAP Action 3.5 Implement a Roundabouts Master Plan, however, has the potential to result in significant safety impacts for pedestrians.

Other proposed CAP actions would not have the potential for significant adverse impacts on traffic and circulation, or would be subject to later, project-specific environmental review. Therefore, impacts of adopting and implementing these actions would be less than significant.

Proposed CAP Action 2.1 Community Choice Aggregation Program could result in the development of large-scale renewable energy facilities that could result in a significant impact to local traffic circulation.

### **Mitigation, Monitoring, and Reporting**

**Mitigation Measure TR-1:** 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.

### **Significance after Mitigation**

Mitigation Measure TR-1 would require the City to monitor, and if necessary, provide an adaptive management program for the Roundabouts Master Plan, called for in CAP Action 3.5. However, this measure would only monitor the implementation of the Roundabouts Master Plan, and not mitigate for the potential impact that could result from implementing the Roundabouts Master Plan. Thus, the program level impact related to transportation and circulation is considered significant and unavoidable.

No large-scale renewable energy facilities are proposed as a part of the CAP, and therefore, the potential impacts from the substantial alteration or disruption of existing traffic and circulation patterns from the construction of such facilities is unknown. Because the degree of impact and applicability, feasibility, and success of any mitigation measures relating to traffic circulation cannot be accurately predicted for any large-scale renewable energy project at this time, the

program level impact related to transportation and circulation is considered significant and unavoidable

***Issue 3: 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.)?***

Implementation of Proposed CAP Action 3.1 Implement the General Plan's Mobility Element and the City of Villages Strategy in Transit Priority Areas, Action 3.2 Implement the City of San Diego's Pedestrian Master Plan in Transit Priority Areas, and Action 3.3 Implement the City of San Diego's Bicycle Master Plan, and Action 3.6 Implement Transit-Oriented Development within Transit Priority Areas would increase the number of people walking, biking, and using transit in the City, especially in the Transit Priority Areas.

Implementation of the CAP would benefit bicycle travel through implementation of the City's Bicycle Master Plan. The CAP would also implement the pedestrian improvements outlined in the Pedestrian Master Plan, which would enhance pedestrian facilities and connectivity. Through implementation of the City of Villages strategy and General Plan Mobility Element, the CAP supports transit infrastructure improvements, frequency of service, and increased ridership.

Because these proposed CAP actions would support and facilitate alternative methods of transportation, such as public transit and bicycle and pedestrian facilities, the CAP would be consistent with the intent of City and regional plans that seek to improve local and regional transportation.

### **Significance of Impact**

This impact would be less than significant and no mitigation is required.

## G. Utilities

### G.1 Introduction

This section analyzes the effects of implementation of the City of San Diego Climate Action Plan (CAP) on wastewater, storm water, solid waste, communications, and energy infrastructure.

### G.2 Environmental Setting

#### Wastewater Management

The Public Utilities Department (PUD) manages the treatment of wastewater from the City of San Diego (City) and 15 other cities and districts in a 450-square mile service area, including: the cities of Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, National City, Poway, the Lemon Grove Sanitation District, the Otay Water District, the Padre Dam Municipal Water District, the county of San Diego (including Lakeside/Alpine, Spring Valley, Wintergardens, and East Otay Mesa). The City's wastewater facilities and infrastructure are shown in **Figure 3.G-1**.

Much of the wastewater generated in the region is conveyed to the Point Loma Wastewater Treatment Plant (PLWTP or Point Loma Plant), where an average of 145 million gallons of wastewater are treated each day before being discharged to the Pacific Ocean through two ocean outfalls. A portion of the wastewater is sent to the North City Water Reclamation Plant (NCWRP), which can recycle up to 30 million gallons of water per day before being distributed throughout the northern San Diego region for reuse. Another portion of wastewater is also sent to the South Bay Water Reclamation Plant (SBWRP), which has a treatment capacity of 15 million gallons and relays reclaimed water to areas in the South Bay. Solids from the wastewater treatment plants are conveyed and processed at the Metro Biosolids Center, and then used as soil amendments, landfill, or landfill cover materials.

Currently, the 2.2 million people in PUD's service area generate an average of 160 million gallons of wastewater per day. The treatment plant and two reclamation plants provide a functional treatment system capacity of 285 MGD, sufficient to meet the future needs of the 450-square-mile service area. PUD is currently planning various improvement programs to comply with the National Pollution Discharge Elimination System (NPDES) Permit and maintain the conveyance system to adequately serve an estimated 2.8 million people by 2050 that would generate an average of 220 million gallons of wastewater per day). In addition, the City has an ongoing need to rehabilitate or replace many pipelines, trunk sewers and pump stations to meet the City's wastewater management needs in accordance with state and federal requirements.

#### Storm Water Management

The City's storm water infrastructure includes more than 39,000 storm drain structures and over 900 miles of storm drain pipes and channels serving approximately 237 square miles of urbanized

development. The City's storm water facilities and infrastructure are shown in **Figure 3.G-2**. The City's storm water pollution prevention efforts are designed to protect and improve the quality of recreational waters and potable water resources, along with beneficial uses of other water resources, to comply with federal, state, and local directives, while fostering a safe and efficient drainage system. The City implements infrastructure improvements and maintenance; water quality monitoring; source identification of pollutants; land use and environmental planning policies and regulations relating to storm water; pollution prevention activities such as education, code enforcement, outreach, public advocacy, and training; and design and development of best management practices.

## Solid Waste

The City's solid waste facilities are shown in **Figure 3.G-3**. Much of the solid waste that is not diverted is disposed of at the City-operated Miramar Landfill, located in central San Diego on the Marine Corps Air Station. In 2013, approximately 803,000 tons of solid waste was disposed of at Miramar Landfill, accounting for 59 percent of the 1.4 million tons of City waste disposed that year. Most of the remaining waste is sent to the Otay Landfill, located on a County unincorporated area within the City of Chula Vista, or the Sycamore Landfill near the City's border with the City of Santee. Both Sycamore and Otay landfills are owned by Allied Waste, known nationally as Republic Services, and in some areas as Pacific Waste. In 2013 Otay landfill received 334 thousand tons of waste (24 percent) and Sycamore Landfill received 229 thousand tons (17 percent) from the City of San Diego. Operation of each facility requires a Solid Waste Facility Permit, issued by the appropriate Local Enforcement Agency, which reports to the California Department of Resources Recycling and Recovery (CalRecycle). The facilities must comply with all applicable federal, state, and local regulations.

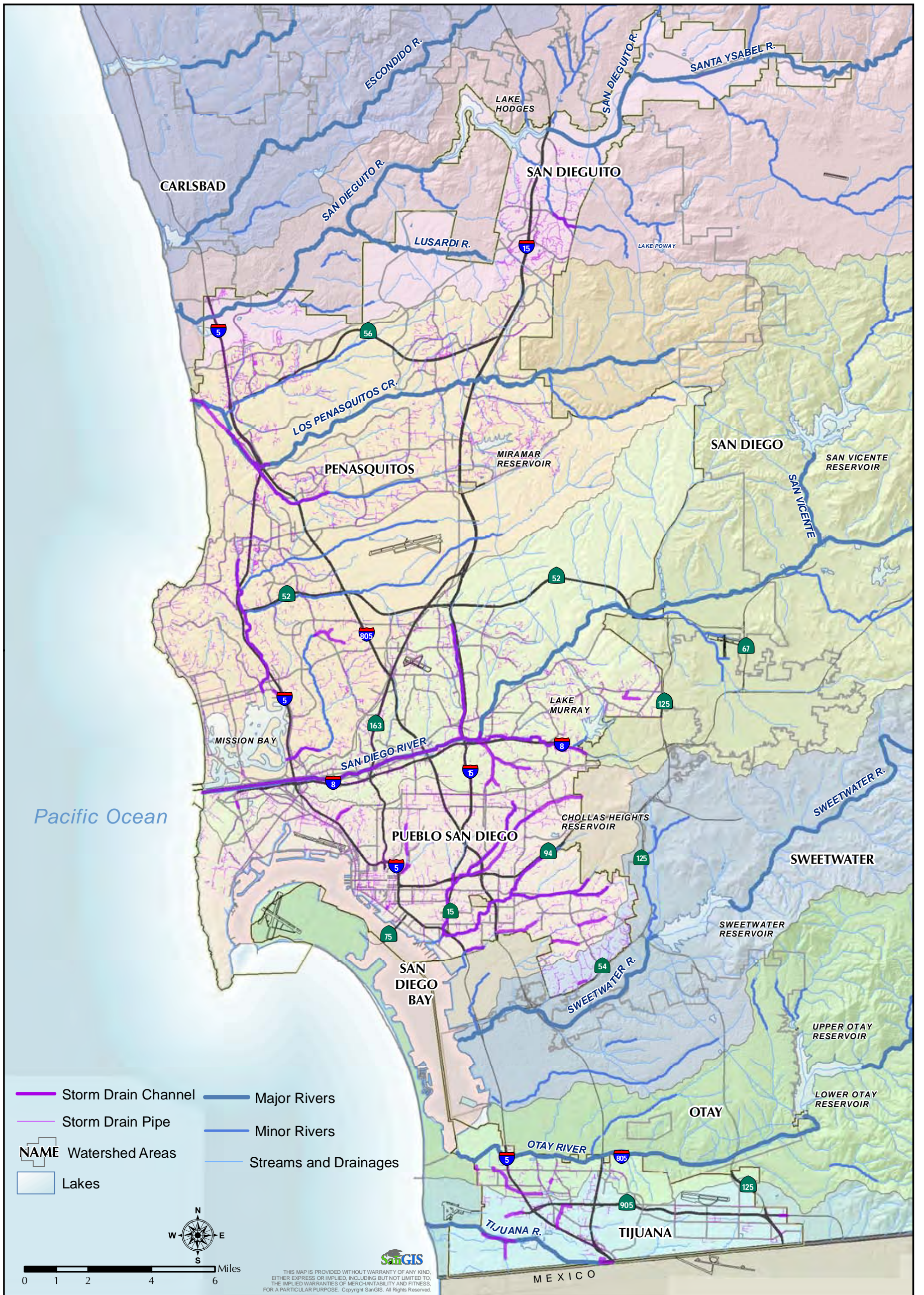
State of California regulations for solid waste (California PRC § 41700 - 41721.5) require that each region have a plan with adequate capacity to manage or dispose of solid waste for at least fifteen years into the future. The solid waste plan for the San Diego County region is contained in the Integrated Waste Management Plan, Countywide Siting Element (2005). The Countywide Integrated Waste Management Plan Five-Year Review Report (2012) estimated that the Miramar Landfill has a closure date of 2022 and the Otay Landfill has a closure date of 2028. Expansion of facilities would be necessary to ensure that the County of San Diego has enough daily permitted capacity to meet solid waste disposal needs until 2028, or the next 14 years; however, the County is lacking sufficient local landfill capacity to meet solid waste disposal needs after 2028 (County of San Diego, 2012).

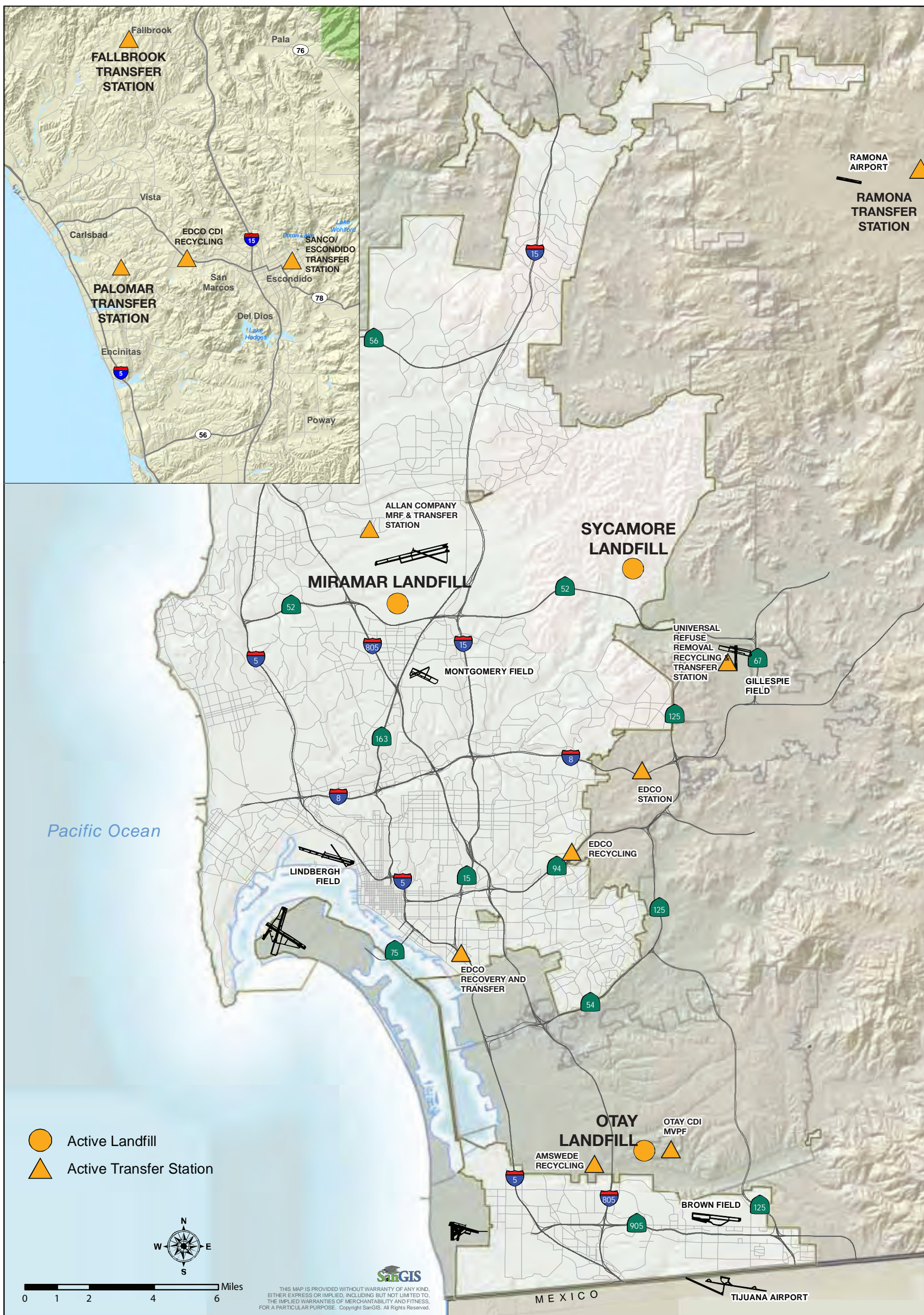
It is the goal of the San Diego Association of Governments' (SANDAG) Comprehensive Resource Management Plan, the Countywide Siting Element, and the County's General Plan to make every effort to extend the life of existing disposal facilities. SANDAG's Regional Comprehensive Plan (RCP) Chapter 4.F provides language regarding "maximizing existing disposal capacity," and aims to achieve a 75 percent diversion rate. The Public Resources Code requires CalRecycle to establish a per capita target for solid waste reduction for each jurisdiction.



SOURCE: City of San Diego Draft General Plan Final PEIR, September 2007







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In 2013 San Diego stayed under its target disposal rate of 8.4 pounds per person per day (PPD), with an actual 5.7 PPD rate (CalRecycle, 2015). Additionally, AB 341 sets a statewide 75 percent waste diversion goal and CalRecycle's Strategic Directive 6.1 calls for a 50 percent reduction in organics disposed, both by 2020. Compliance with and implementation of the above state regulations and policy goals could potentially extend the life of existing landfills. On July 13, 2015 the City adopted a Zero Waste Plan, referenced in CAP Action 4.1, which would result in 70 percent waste diversion by 2020, 90 percent waste diversion by 2035 and 100 percent diversion by 2040.

## Energy Generation

San Diego Gas & Electric Company (SDG&E) provides energy service to 3.3 million consumers through 1.3 million electric meters and more than 800,000 natural gas meters in San Diego and southern Orange counties. The utility's area spans 4,100 square miles. **Figure 3.G-4, 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 as 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. 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 (SDG&E, 2010). Natural gas is imported into the City from sources outside of the region through pipelines to users and in addition to generating electricity is used for heating homes and businesses.

## G.3 Regulatory Setting

### Federal

#### ***International Boundary & Water Commission***

The International Boundary & Water Commission (IBWC) is the agency charged with finding solutions to the problem of untreated wastewater flowing into San Diego's South Bay area from Mexico. Organized in 1889, the IBWC has responsibility for establishing the boundary and water treaties between the United States and Mexico and settling differences that may arise out of these treaties. The IBWC is a binational body with a U.S. Section and a Mexican Section, each headed by an engineer-commissioner appointed by their respective Presidents.

#### ***Clean Water Act***

The Clean Water Act (CWA) is the cornerstone of surface water quality protection in the United States. The statute employs a variety of regulatory and non-regulatory tools to sharply reduce direct pollutant discharges into waterways, finance municipal wastewater treatment facilities, and manage polluted runoff.

Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the United States. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric although narrative criteria based on bio-monitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical standards. The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Board (RWQCB) are responsible for ensuring implementation and compliance with the provisions of the Federal CWA.

In 1972, the CWA was amended to provide that the discharge of pollutants to waters of the United States from any point source is unlawful unless the discharge is in compliance with an NPDES permit. The 1987 amendments to the CWA added Section 402(p), which establishes a framework for regulating municipal and industrial storm water discharges, including discharges associated with construction activities, under the NPDES program.

### ***Resource Conservation and Recovery Act***

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. RCRA amended the Solid Waste Disposal Act of 1965 and set national goals for: protecting human health and the natural environment from the potential hazards of waste disposal; energy conservation and natural resources protection; reducing the amount of waste generated, through source reduction and recycling and ensuring the management of waste in an environmentally sound manner. RCRA is now most widely known for the regulations that set standards for the treatment, storage and disposal of hazardous waste in the United States. The U.S. Environmental Protection Agency (EPA) published waste management regulations, which are codified in Title 40 of the Code of Federal Regulations at parts 239 through 282. Most states have enacted laws and created regulations that are at least as stringent as the federal regulations.

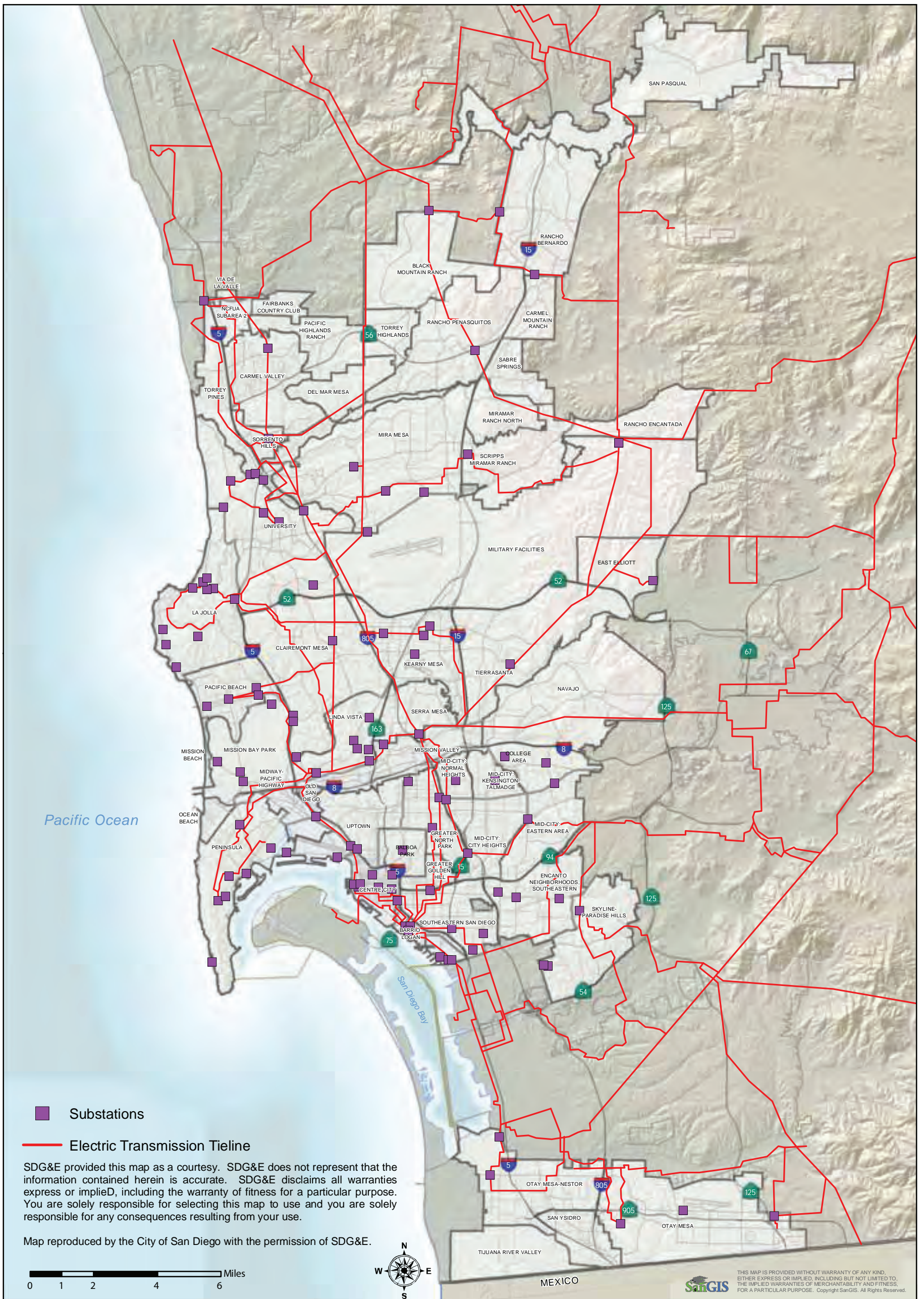
## **State**

### ***California Water Code***

The California Water Code, a section of the California Code of Regulations, establishes the governing laws pertaining to all aspects of water management in California.

### ***State Water Resources Control Board***

The State Water Resources Control Board (SWRCB) was created by the Legislature in 1967 with the mission of ensuring the highest reasonable quality for waters of the State, while allocating those waters to achieve the optimum balance of beneficial uses. The SWRCB has authority over water allocation by administering and regulating appropriative water right permits and licenses, as per the Water Code, which require all use of water to be “reasonable and beneficial,” which includes municipal and industrial uses, irrigation, hydroelectric generation, and livestock watering.



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In 1970, the Porter-Cologne Water Quality Act created nine Regional Water Quality Control Boards (RWQCBs) that develop and enforce water quality objectives of the State and implementation plans within their region. The Regional Boards oversee various programs that protect surface water and groundwater quality, and enforce the federal NPDES Wastewater Program, and NPDES Storm Water Program. The Regional Boards are also responsible for developing and implementing Total Maximum Daily Loads (TMDLs) for impaired water bodies. The City of San Diego is located within Region 9, which is the San Diego Regional Water Quality Control Board.

### ***Executive Order B-29-15***

On April 1, 2015, Governor Brown signed Executive Order B-29-15, which for the first time in state history implements mandatory water reductions in cities and towns across California to reduce water usage by 25 percent. The order also calls on local water agencies to adjust their rate structures to implement conservation pricing, recognized as an effective way to realize water reductions and discourage water waste.

### ***California Storm Water Regulatory Program***

Drawing authority from the federal Water Pollution Control Act (Clean Water Act) and the NPDES Permit system, the SWRCB provides storm water policy and regulatory oversight, on behalf of the federal government. Under the program, cities and other jurisdictions that operate large, medium, and small storm water systems, as well as specific industrial sites and construction sites, that disturb more than an acre of land must apply for storm water permits. Construction permits are based on overall risk and may require certain measures to prevent erosion and reduce sediment and other pollutant discharges. Industrial activities are required to use the best technology available to reduce pollutants, and may be required to develop a storm water pollution prevention plan and monitoring plan. Municipal separate storm sewer system (MS4) operators must comply with permits that regulate storm water entering their systems under a two phase system.

### ***California Code of Regulations***

In accordance with Title 27 of the California Code of Regulations (CCR), Sections 21600 through 21900, all solid waste disposal sites are jointly regulated under Title 27 CCR, Division 2, Chapters 1 through 8, Section 20005 through 23014; the California RWQCB; and CalRecycle. Solid waste transfer stations and compost sites are regulated under Title 14 CCR, Division 7, Chapters 3 and 4, Sections 17200 through 17870. Transfer stations and compost sites are primarily regulated by CalRecycle. The RWQCB has recently begun to regulate compost sites and has a limited authority regarding transfer stations. The City of San Diego is the Local Enforcement Agency (LEA) for all land within the city's boundaries.

### ***California Public Resources Code***

AB 939 modified the Public Resources Code to establish the "California Integrated Waste Management Act (IWMA) of 1989, which defined an integrated waste management hierarchy



starting with the newly established CalRecycle (formerly the California Integrated Waste Management Board) and local agencies, to guide in implementation of, in order of priority as follows: (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 also replaced the various County Solid Waste Management Plans (CoSWMP) with Integrated Waste Management Plans (IWMP) and Siting Elements. AB 939 established statewide waste diversion goals to divert 25 percent of all solid waste from landfills by January 1, 1995 and 50 percent of all solid waste by January 1, 2000 through source reduction, recycling, composting, and, to a limited extent, transformation activities. AB 939 also established a comprehensive statewide system of permitting, inspections, enforcement, and maintenance for solid waste facilities, although the measurement for the waste diversion was changed to disposal-based, per capita limits by SB 1016, and the statewide waste diversion from disposal target was increased to 75 percent by AB 341.

### ***California Global Warming Solutions Act of 2006***

The passage of AB 32 requires a sharp reduction of greenhouse gas (GHG) emissions for the State of California to set the stage for its transition to a sustainable, low-carbon future. AB 32 was the first program in the country to take a comprehensive, long-term approach to addressing climate change, and does so in a way that aims to improve the environment and natural resources while maintaining a robust economy. As part of AB 32, landfill methane emissions are a targeted source of GHG reductions, as methane is a powerful GHG with about ten times the global warming potential of carbon dioxide.

### ***California Public Utilities Commission***

The California Constitution vests in the California Public Utilities Commission (CPUC), the exclusive power and sole authority to regulate privately owned or investor-owned public utilities such as SDG&E. This exclusive power extends to all aspects of the location, design, construction, maintenance, and operation of public utility facilities. Nevertheless, the CPUC has provisions for regulated utilities to work closely with local governments and give due consideration to their concerns. The state also regulates energy consumption under Title 24 of the California Code of Regulations. The Title 24 Building Energy Efficiency Standards apply to energy consumed for heating, cooling, ventilation, water heating, and lighting in new residential and non-residential structures.

### ***Senate Bill 226***

The passage of SB 226 adds section 21080.35 to the Public Resources Code, and creates a new categorical exemption under CEQA for the installation of solar energy systems, including associated equipment, on the roof of an existing building or at an existing parking lot.

### ***Renewable Energy Portfolio Standard***

California's Renewables Portfolio Standard (RPS) was established in 2002 under SB 1078, accelerated in 2006 under SB 107 and expanded in 2011 under SB 2. As one of the most ambitious renewable energy standards in the country, the RPS program requires investor-owned

utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 33 percent of total procurement by 2020.

## **Regional**

### ***Regional Energy Strategy 2030***

The City participates in regional energy planning efforts, and is actively working to achieve the City's long-term goal to pursue energy independence. The Regional Energy Strategy (RES) 2030 was produced to develop a vision for how energy will be produced and consumed in the region. The strategy developed policies and provided measurable targets to achieve the region's sustainable energy vision. At a regional level, the current status toward meeting these targets is reported in the RCP Performance Monitoring Report, most recently release for the years 2012-2013.

## **Local**

### ***Construction and Demolition Diversion Ordinance***

The City of San Diego Municipal Code contains the City's Construction and Demolition Debris Ordinance (Sections 66.0601 through 66.0610), which requires an applicant for a building or demolition permit to divert 50 percent, by weight, of the total construction and demolition debris generated.

### ***Recycling Ordinance***

The of San Diego Recycling Ordinance was adopted in 2007 and fulfills requirements in Senate Bill 341 which mandated recycling regulations and enhanced recycling requirements for businesses and multifamily residences, as well as increased reporting requirements, for the whole state. The Ordinance requires all residential, commercial, and industrial property owners to procure recycling services in order to increase waste diversion from landfills.

### ***City of San Diego General Plan***

The following policies from the City of San Diego General Plan, adopted 2008, are applicable to wastewater, storm water, solid waste, and energy facilities.

#### **Wastewater**

PF-F.5 Construct and maintain facilities to accommodate regional growth projections that are consistent with sustainable development policies (see also Conservation Element, Section A).

#### **Waste Management**

PF-I.1 Provide efficient and effective waste collection services.

- a. Route City and private fleets to minimize truck trip distances and use fuel-efficient vehicles producing low emissions.

- b. Design or retrofit City and private operation stations consistent with sustainable development policies (see also Conservation Element, Section A).
- c. Encourage waste reduction and recycling with source-separated collection of materials.
- d. Provide space for recycling containers and efficient collection.
- e. Identify additional funding sources for all waste management services.

PF-I.2 Maximize waste reduction and diversion (see also Conservation Element, Policy CE.A.9).

- a. Conveniently locate facilities and informational guidelines to encourage waste reduction, diversion, and recycling practices.
- b. Operate public and private facilities that collect and transport waste and recyclable materials in accordance with the highest environmental standards.
- c. Support resource recovery programs that produce soil additives, mulch, or compost from yard debris and organic waste.
- d. Maximize the separation of recyclable and compostable materials.
- e. Collaborate with public and private entities to support the development of facilities that recycle materials into usable products or that compost organic materials.
- f. Reduce and recycle Construction and Demolition (C&D) debris. Strive for recycling of 100 percent of inert C&D materials and a minimum of 50 percent by weight of all other material.
- g. Use recycled, composted, and post-consumer materials in manufacturing, construction, public facilities and in other identified uses whenever appropriate.
- h. Encourage advance disposal fees to prevent the disposal of materials that cause handling problems or hazards at landfills.
- i. Provide sufficient information on the movement of waste and recyclable materials to meet regulatory requirements at public and private transfer stations and materials recovery facilities to allow adequate planning.
- j. Reduce subsidies to disposal and encourage incentives for waste diversion.
- k. Promote manufacturer and retailer responsibility to divert harmful, reusable, and recyclable products upon expiration from the waste stream.
- l. Encourage the private sector to build a mixed construction and demolition waste materials recycling facility.
- m. Expand and stabilize the economic base for recycling in the local and regional economy by encouraging and purchasing products made from recycled materials.
- n. Continuously assess new technologies for recycling, composting, cogeneration, and disposal to maximize efficient use of City resources and environmental protection.

- PF-I.3 Provide environmentally sound waste disposal facilities and alternatives.
- a. Design and operate disposal facilities located within the City, or that serve as a destination for City waste, to meet or exceed the highest applicable environmental standards.
  - b. Identify and investigate alternatives to standard disposal practices as fiscally- and environmentally sound technologies become available.
  - c. Ensure efficient, environmentally sound refuse and recyclable materials collection and handling through appropriate infrastructure, alternative fuel use, trip coordination, and other alternatives.
  - d. Ensure environmentally and economically sound disposal options for materials that cannot be effectively reduced, reused, recycled, or composted.
  - e. Plan for disposal needs considering factors such as trip distance and environmentally sound disposal capacity.
  - f. Cooperate on a regional basis with local governments, state agencies, and private solid waste companies to find the best practicable, environmentally safe, and equitable solutions to solid and hazardous waste management.
  - g. Maximize environmental benefit in landfill-based waste diversion and effective load check programs by ensuring that recyclable or hazardous materials do not end up in the landfill.
  - h. Use closed and inactive landfill sites for public benefits, such as provision of energy from waste generated methane, reaction of wildlife habitat upon proper remediation or other land uses such as parks determined to be appropriate.
- PF-I.4 Promote litter prevention efforts and practices.
- a. Provide conveniently located public litter containers on public streets and in large public venues and strategically located recyclable materials containers.
  - b. Encourage partnerships and collaborative efforts to sponsor and coordinate neighborhood pride/cleanup events.
  - c. Promote anti-litter education campaign and encourage point of purchase and other funding options to support education and cleanup efforts.

### **Urban Runoff Management**

- CE-E.2c Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible.
- CE-E.2d Increase the use of vegetation in drainage design
- CE-E.6 Continue to encourage "Pollution Control" measures to promote the proper collection and disposal of pollutants at the source, rather than allowing them to enter the storm drain system.
- a. Promote the provision of used oil recycling and/or hazardous waste recycling facilities and drop-off locations.

- b. Review plans for new development and redevelopment for connections to the storm drain system.
- c. Follow up on complaints of illegal discharges and accidental spills to storm drains, waterways, and canyons.

### **Sustainable Energy**

- CE-I.1 Maintain a centralized Energy Conservation and Management Program and Comprehensive Plan for all City operations.
- CE-I.2 Coordinate City energy planning programs with federal, state and regional agencies. Maximize energy efficiency, use of clean renewable resources, and demand response.
- CE-I.3 Pursue state and federal funding opportunities for research and development of alternative and renewable energy sources.
- CE-I.4 Maintain and promote water conservation and waste diversion programs to conserve energy.
- CE-I.5 Support the installation of photovoltaic panels, and other forms of renewable energy production.
  - a. Seek funding to incorporate renewable energy alternatives in public buildings.
  - b. Promote the use and installation of renewable energy alternatives in new and existing development.
- CE-I.6 Develop emergency contingency plans, in cooperation with other local agencies and regional suppliers, to assure essential energy supplies and reduce non-essential consumption during periods of energy shortage.
- CE-I.7 Pursue investments in energy efficiency and direct sustained efforts towards eliminating inefficient energy use.
- CE-I.8 Improve fuel -efficiency to reduce consumption of fossil fuels.
- CE-I.9 Implement local and regional transportation policies that improve mobility and increase energy efficiency and conservation.
- CE-I.10 Use renewable energy sources to generate energy to the extent feasible.
- CE-I.11 Collaborate with others to develop incentives to increase the use of renewable energy sources or reduce use of non-renewable energy sources.
- CE-I.12 Use small, decentralized, aesthetically-designed, and appropriately-sited energy efficient power generation facilities to the extent feasible.
- CE-I.13 Promote and conduct energy conservation education.

## G.4 Impacts and Mitigation Measures

### Significance Criteria

According to the City of San Diego's CEQA Significance Determination Thresholds, an impact related to public utilities, including natural gas, water, sewer, solid waste disposal, or communication systems, would be considered significant if implementation of the CAP would:

- Result in the need for new systems, or requires substantial alterations to existing utilities, the construction of which would create physical impacts;
- Result in the use of excessive amounts of fuel or energy (e.g. natural gas);
- Result in the use of excessive amounts of power;
- Result in use of excessive amounts of water; or
- Result in landscaping which is predominantly non-drought resistant vegetation.

### Impact Analysis

As indicated in Table 2-5 in Chapter 2, Project Description, the proposed CAP actions that could have an impact on public utilities include the following:

- **Action 1.5 Outdoor Landscaping Ordinance.** Supporting measures and steps that support implementation of this action could result in the 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. This could lead to increased recycled water supply and delivery systems.
- **Action 2.1 Community Choice Aggregation Program or Similar Program.** Supporting measures and steps that support implementation of this action could result in installation of small scale and large scale renewable energy generation, transmission, and storage systems. These could result in the extension, expansion, rerouting, and construction of new public and private utility needs.
- **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.** These actions would facilitate the implementation of the City of Villages strategy and the shift to greater emphasis on mass transit and other modes of transportation. These actions could, therefore, result in new construction and other physical changes that could result in new or modifications to the existing infrastructure systems to support a more concentrated urban landscape.
- **Action 3.6 Implement the City's Pedestrian Master Plan in Transit Priority Areas, Action 3.3 Implement the City's Bicycle Master Plan, and Action 3.5 Implement a Roundabouts Master Plan.** These actions would generally result in minor changes to improve or add pedestrian and bicycle facilities, primarily in and around the TPAs, and would result in the installation of up to 24 roundabouts to facilitate traffic flow. These changes could result in replacement or relocation of existing public utility infrastructure.
- **Action 4.1 Divert Solid Waste and Capture Landfill Emissions.** These actions could lead to the development of new or expanded waste diversion and gas capture/use facilities.

Development of such facilities may result in the construction of new or expansion of existing natural gas, communication systems, water, sewer, and solid waste disposal systems.

- **Action 4.2 Capture Methane from Wastewater Treatment.** Associated actions could result in new or expanded wastewater treatment facilities, such as anaerobic digesters. These could result in the extension, expansion, rerouting, and construction of new public utility infrastructure.

## Impacts and Mitigation Measures

### *Issue 1: Would implementation of the CAP result in a need for new utility systems, or require substantial alterations to existing infrastructure?*

Several of the CAP strategies include actions that when implemented will result in physical changes to the environment. Some of these changes may result in a need for new utility systems or require modifications or retrofits to existing infrastructure.

Action 1.5 would involve implementation of the Outdoor Landscaping Ordinance, which would result in more efficient landscape irrigation systems and encourage the installation of landscaping that uses less water. This action could result in the construction of new or expansion of existing water recycling facilities and infrastructure, and installation of recycled water delivery systems, monitoring systems, etc. The use of more efficient landscape irrigation systems is consistent with the City's Recycled Water Study and Recycled Water Master Plan, which include long-term goals to optimize water reuse, including increased recycled water irrigation use.

Action 1.5 would also reduce outdoor water use, and would in turn reduce runoff from landscape irrigation. Implementation of the CAP would result in alterations to existing buildings and infrastructure, in the form of building retrofits as well as improvements to the transportation and utility systems; however, such changes are not expected to substantially increase impervious surfaces to the extent that it would require the construction of new storm water infrastructure. Such improvements would be subject to existing City policies and regulations and General Plan policies and programs applicable to storm water, including the Municipal Storm Water NPDES Permit. Because the CAP would reduce, rather than increase, storm water runoff, it is not anticipated that it would cause new or more severe impacts related to storm water.

As described in the CAP, the City's GHG inventory shows that energy consumption accounts for 40 percent of the emissions generated by the City. These emissions are the result of energy generation methods that emit high levels of GHGs, which include combustion of natural gas and coal. Action 2.1 of the CAP establishes a goal for the City to supply 100 percent of its electricity needs with renewable sources by 2035 through a community choice aggregation program or similar program, which would leverage the aggregated purchasing power of individual customers to purchase renewable energy on a large scale, and through encouraging local solar photovoltaic (PV) and solar water heater installations. Small scale facilities, such as rooftop photovoltaic panels, generally do not require substantial alterations to existing public utility infrastructure and therefore, would have less-than-significant impacts to public utilities. Additionally, this strategy

is intended to reduce the demand on utility systems, thereby reducing the energy used to operate such facilities and the emissions associated with generating that energy.

Large scale renewable energy projects, such as solar and wind farms, could involve new, large or extensive facilities that could result in a need for new utility systems, or require substantial alterations to existing infrastructure. New or expanded facilities may include or supply power generation and transmission facilities, which may have both construction effects and operational effects, including the disruption of services due to replacement or relocation of existing facilities. These impacts could be significant.

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 strategy are intended to facilitate implementation of major changes to the urban landscape already planned for in the General Plan, Sustainable Communities Strategy, and other planning documents. These changes would result in the development of more dense, built-up, and transit and alternative transportation-oriented development, particularly within the TPAs. The City of Villages strategy would reduce per capita demand for services, but could still result in localized effects (e.g., installation of new transmission or conveyance systems) as well as new or upgraded facilities. Because future development of properties within the City of Villages planning areas would likely increase demand, there may be a need to increase sizing of existing pipelines and mains for both wastewater and water, which could adversely affect existing utilities, as discussed more fully in the General Plan EIR.

The CAP does not propose any site-specific projects or allow for development that would result in a direct increase in demand for public utilities. The strategies in the CAP would generally support the General Plan Mitigation Framework by reducing energy and water demand, and extending the useful life of landfills. However, improvements to existing utilities systems and the development of new systems are anticipated to be developed to meet certain goals within the CAP that could have significant effects.

Proposed CAP Actions 3.2 and 3.3 would make generally minor changes to improve or add pedestrian and bicycle facilities, primarily in and around the TPAs, and would result in the installation of up to 24 roundabouts to facilitate traffic flow. These changes could result in replacement or relocation of existing public utility infrastructure. These impacts would be temporary in nature and are not expected to result in substantial alterations to existing infrastructure.

Action 4.1 would result in alterations to existing landfills to increase the methane capture rate to 80 percent in 2020 and 90 percent by 2035. Improvements to existing gas-capture equipment would not require the expansion of existing landfill facilities, and would not modify the remaining capacity of existing landfills. However, such improvements could result in construction activities within the existing footprint of affected landfill facilities that could generate construction waste. Action 4.1 also establishes a goal to reach zero waste disposal (90 percent diversion) by 2040. Such measures include a change to the weekly collection of recycling and green waste and addition of food scraps. This could result in new or expanded



organics processing and recycling processing. To achieve 90 percent waste diversion, existing recycling and transfer facilities may need to be expanded, and new waste handling facilities may need to be constructed. Associated construction and operational impacts of these facilities could be significant.

Any solid waste generated during construction-related activities associated with implementation of the CAP would be recycled or disposed of in accordance with all applicable local, state, and federal regulations. Demolition or construction materials that can be recycled or reused would comply with the City's Construction and Demolition Debris Ordinance. Any new facilities or expansions to existing facilities would be subject to existing City policies and regulations and General Plan policies and programs applicable to solid waste facilities.

Implementation of Strategy 4.2 in the CAP would result in alterations to existing wastewater facilities to increase the methane capture rate from 71 percent in 2010 to 98 percent by 2035. Such improvements could result in construction activities within the existing footprint of affected wastewater facilities, which could have short-term effects related to air quality, noise, traffic, GHG emissions, and hydrology. Such projects would be subject to existing City policies and regulations and General Plan policies and programs applicable to wastewater.

### **Significance of Impact**

As discussed above, implementation of the City of Villages strategy, as facilitated by the CAP, has the potential to result in significant impacts to utility systems. However, because 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 strategy are not considered impacts of the CAP.

Also as noted above, development of large-scale renewable energy facilities, water recycling facilities, and waste processing facilities could potentially require new or expanded utility systems. The CAP contains no specific plans for developing such facilities, but only anticipates that they may be developed in the future, and such impacts would be site- and project-specific. For example, a large-scale renewable energy generation facility could be proposed for a site already adequately served with electrical transmission lines, water, sewer, communications, and stormwater systems, and so would not have a significant impact on utility systems; while another proposed facility may not be so well served, and may therefore require the expansion or extension of utility systems. The City's process for the evaluation of discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects' consistency with the goals, policies, and recommendations of the General Plan. As future environmental analysis would be required for specific public utilities projects necessary to implement the CAP, impacts associated with construction and operation of new or substantially altered utilities systems would be addressed at the project-level. Therefore, such impacts would be examined as specific projects are proposed, and for the purposes of this PEIR, impacts of the CAP on utility systems are less than significant.

### **Mitigation Framework**

No mitigation is required.

## H. Water Supply

### H.1 Introduction

This section analyzes potential impacts on water supply that could result from implementation of the City of San Diego (City) Climate Action Plan (CAP).

### H.2 Environmental Setting

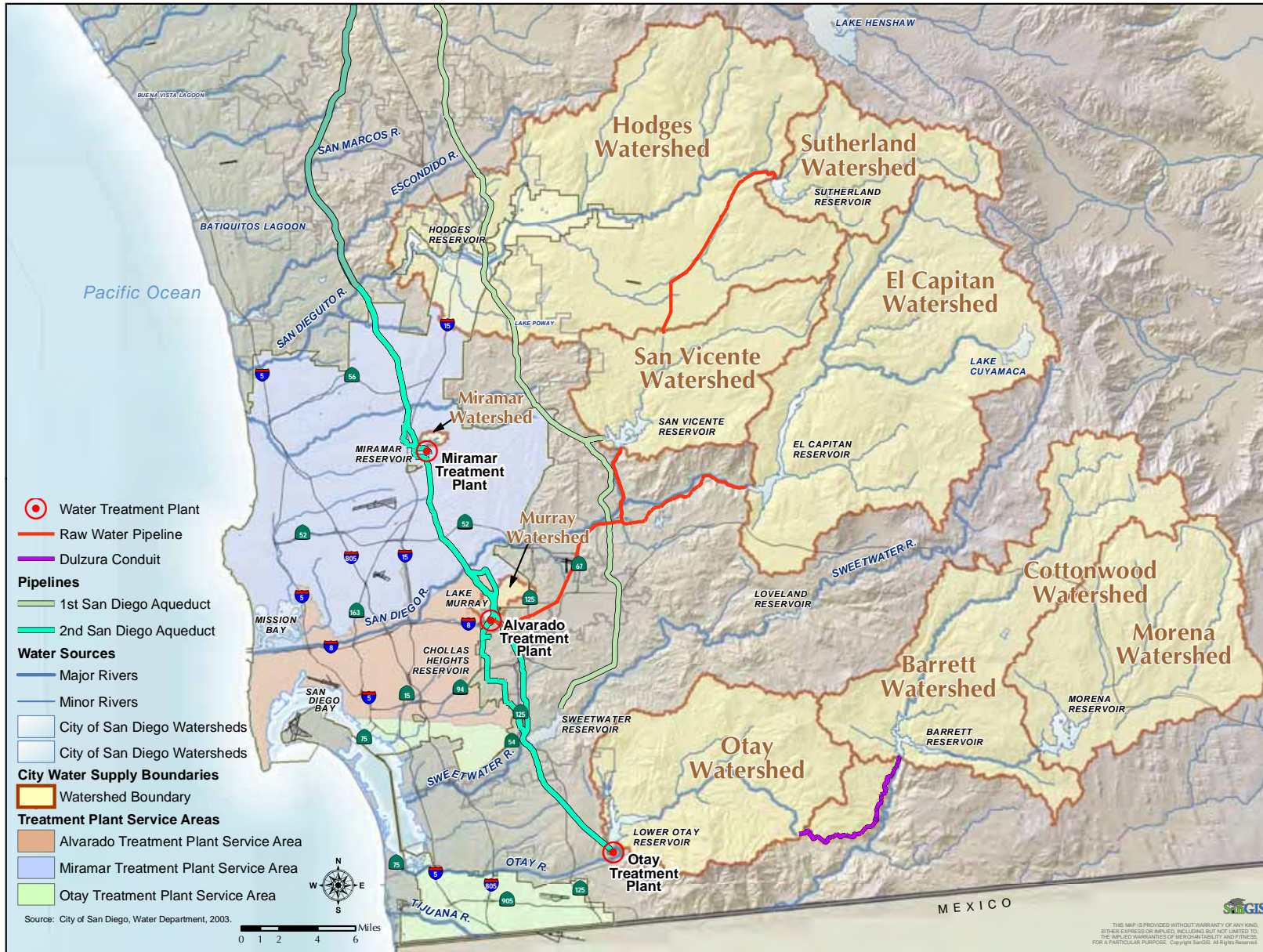
#### Regional Water Supply

The climate in the San Diego region is a semiarid coastal desert with little rainfall (averaging ten inches annually); therefore, the City relies heavily on imported water to meet its demands. The City of San Diego purchases water from the San Diego County Water Authority (Water Authority or SDCWA), a wholesale water agency that provides water to 24 member agencies. SDCWA purchases much of its water from the Metropolitan Water District of Southern California (MWD), which is a cooperative of 26 cities and water agencies that serve 19 million people across six counties in Southern California in a 5,200 square mile service area. MWD has stated that it “would provide the Water Authority with adequate supplemental imported supplies in normal years and a single dry-year. In multiple dry years, under its projected preferential right formula, the Water Authority could experience shortages (SDCWA, 2011).”

MWD imports water from Northern California via the State Water Project (SWP) and the Colorado River. Water from the SWP is captured in reservoirs north of Sacramento before its released through natural rivers and streams into the Sacramento-San Joaquin Delta, where it travels down the 444-mile long California Aqueduct which is operated by the Department of Water Resources (DWR). Water from the Colorado River travels from Lake Havasu on the California-Arizona border down the 242 mile long Colorado River Aqueduct where it joins the imported water from the SWP at a MWD facility in Riverside County before being transferred to local water treatment plans. The City’s potable water system is shown in **Figure 3.H-1**.

#### SDCWA Water Supply Diversification

In the past, the City relied on water from MWD for 95 percent of its supply. During years of drought this made the City extremely vulnerable to water supply shortages, such as in 1991 when a drought forced MWD to cut its deliveries to San Diego by 30 percent. As a result, SDCWA has implemented a strategy to aggressively diversify its water supply portfolio through the introduction of new local and imported water supplies, so that by 2014 MWD deliveries accounted for around 49 percent of the total supply with new sources and conservation efforts accounting for the remaining 51 percent. **Table 3.H-1** shows the change in SDCWA’s water supply portfolio from historic supplies in 1991 to present day and future supplies in 2020.



SOURCE: City of San Diego Draft General Plan Final PEIR, September 2007

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**Figure 3.H-1**  
Surface and Recycled Water System

**TABLE 3.H-1  
SDCWA WATER SUPPLY DIVERSIFICATION**

Source	1991		2014		2020	
	TAF	Percent	TAF	Percent	TAF	Percent
Metropolitan Water District	550	95	326	49	231	30
Imperial Irrigation District Transfer	-	-	100	15	190	24
All American and Coachella Canal Lining	-	-	80	12	80	10
Conservation Efforts	-	-	73	11	103	13
Local Surface Water	28	5	40	6	48	6
Recycled Water	-	-	29	4	44	6
Groundwater	-	-	19	3	27	4
Seawater Desalination	-	-	-	-	56	7
<b>Total</b>	<b>578</b>	<b>100</b>	<b>667</b>	<b>100</b>	<b>779</b>	<b>100</b>

NOTES: TAF represents one thousand acre feet per year, or 325,851 thousand gallons.

SOURCE: SDCWA, 2015.

SDCWA secured new imported water supplies through a long-term (45-75 year) water conservation and transfer agreement with the Imperial Irrigation District, which provided approximately 100,000 acre-feet of water from the Colorado River in 2014 and will double by 2021. SDCWA has a separate 110-year agreement to receive approximately 80,000 acre-feet of water from the Colorado River by lining parts of the Coachella and All-American canals.

SDCWA is also in the final stages of executing a \$3.1 billion Capital Improvements Program that involves 50 different projects, including new reservoirs, pipelines, pumping stations, a new regional water treatment facility, and a project to raise the San Vicente Dam to allow for additional local storage. Other strategies involve collaboration with SDCWA’s 24 local member retail agencies, and include: promoting water conservation through water use efficiency programs, and the introduction of supplies from groundwater, recycled water, and seawater desalination. Additional information about SDCWA water supply diversification projects is provided in SDWCA’s 2010 Urban Water Management Plan (UWMP).

### City of San Diego Water Supply

The City of San Diego water system serves more than 1.3 million people populating approximately 340 square miles. The City also conveys and sells water to the City of Del Mar, Santa Fe and San Dieguito Irrigation Districts, and California American Water Company (Cal-Am), which, in turn, serves the Cities of Coronado and Imperial Beach and portions of south San Diego. The City has agreements to sell surplus water to Otay Water District and exchange water to Ramona Municipal Water District. The City maintains several emergency connections to and from neighboring water agencies, including Santa Fe Irrigation District, Poway Municipal Water District, Otay Water District, Cal-Am, and Sweetwater Authority.

The City has nine local surface water reservoirs with more than 408,000 AF of capacity, which are connected directly or indirectly to three water treatment plants that include the Miramar Water Treatment Plant (WTP), the Alvarado WTP, and the Otay WTP and have a combined total treated capacity of 294 MGD. The department maintains and operates 32 treated water storage facilities, and a series of distribution lines to serve San Diego residents. Along with the potable water supply, the City has two water reclamation plants to treat wastewater to a level that is approved for irrigation, manufacturing and other non-drinking, or non-potable purposes. The Public Utilities Department (PUD) maintains and operates the recycled water distribution system.

The geography of San Diego provides limited natural local supplies in the form of groundwater, and in order to be usable, much of the available groundwater must undergo desalination to be potable. While the PUD has potential groundwater supply options estimated at 6,000 – 20,000 AFY, the current cost of utilizing the supply under current technology is infeasible. The San Pasqual/Lake Hodges groundwater basin is currently used for irrigation by some of the leaseholds.

The City currently purchases most of its water from the SDCWA, averaging between 100,000 and 228,000 acre-feet (AF) of water per year for the last 20 years. Other sources of water for the City include local surface water, groundwater, and recycled water sources. **Table 3.H-2** shows the City’s projected water supply through 2035.

**TABLE 3.H-2  
CITY OF SAN DIEGO WATER SUPPLY**

Source	2015		2020		2035	
	AF	Percent	AF	Percent	AF	Percent
San Diego County Water Authority	201,719	83.9	221,458	85.1	260,107	87.0
Supplier Produced Surface Water	29,000	12.1	29,000	11.1	29,000	9.7
Supplier Produced Groundwater	500	0.2	500	0.2	500	0.2
Recycled Water	9,253	3.8	9,253	3.6	9,253	3.1
<b>Total</b>	<b>240,472</b>	<b>100</b>	<b>260,211</b>	<b>100</b>	<b>298,860</b>	<b>100</b>

NOTES: AF represents one acre-foot or 325,851 gallons.

SOURCE: City of San Diego, 2011.

To improve water supply reliability the City continues to pursue water recycling and the expansion of its conservation programs. The City relies upon SDCWA and MWD to develop additional sources of water and storage for increased reliability. In the event of short-term interruptions in water supply, the City has developed a water shortage contingency plan that outlines actions that would be taken to reduce water consumption throughout its service area.

## Water Conservation

The City’s Water Conservation Program was adopted by the City Council in 1985 to reduce San Diego’s dependency upon imported water. The program now accounts for over 30 million gallons per day (mgd) of potable water savings. Water conservation goals in the City’s 2005

Urban Water Management Plan, the City of San Diego Long-Range Water Resources Plan (2002 – 2030) and the Strategic Plan for Water Supply (1997 – 2015) were established at: 32,000 AF by 2010; 36,000 AF by 2020; and 46,000 AF by 2030. The 2010 goal was achieved; however, in accordance with Senate Bill x7-7 the City's water savings goals for 2020 are now 40,400 AF per year to meet the required 20 percent reduction per capita set by the State's 20x2020 Water Conservation Plan. In response to the 20x2020 Water Conservation Plan, the City's Water Conservation Program includes water demand reduction through promoting or providing incentives for the installation of hardware that provides permanent water savings, and by providing services and information to help San Diegans make better decisions about water use. The program includes initiatives such as the rain barrel rebates, grass replacement and micro-irrigation rebates, free mulch program, commercial landscape survey program, residential interior/exterior survey program, and a variety of public outreach and education efforts including free California-friendly landscape classes. The City also has a plumbing retrofit upon re-sale ordinance for all buildings to have water-conserving plumbing fixtures in place prior to change of ownership.

## H.3 Regulatory Setting

### Federal

#### ***Safe Drinking Water Act***

The Safe Drinking Water Act (SDWA), administered by the United States Environmental Protection Agency (EPA) in coordination with the California Department of Public Health (CDPH), is the main federal law that ensures the quality of Americans' drinking water. Under SDWA, EPA sets standards for drinking water quality and oversees the states, localities, and water suppliers who implement those standards. In 1996, Congress amended the Safe Drinking Water Act to emphasize sound science and risk-based standard setting, small water supply system flexibility and technical assistance, community-empowered source water assessment and protection, public right-to-know, and water system infrastructure assistance through a multi-billion-dollar State revolving loan fund.

### State

#### ***California Water Code***

The California Water Code, a section of the California Code of Regulations, establishes the governing laws pertaining to all aspects of water management in California.

#### ***State Water Resources Control Board***

As discussed in Section 3.G Utilities, the State Water Resources Control Board (the State Water Board) was created by the Legislature in 1967 with the mission of ensuring the highest reasonable quality for waters of the state, while allocating those waters to achieve the optimum balance of beneficial uses. The Water Board has authority over water allocation by administering and regulating appropriative water right permits and licenses, as per the Water Code, which require all

use of water to be “reasonable and beneficial,” which includes municipal and industrial uses, irrigation, hydroelectric generation, and livestock watering.

In 1970, the Porter-Cologne Water Quality Act created nine Regional Water Quality Control Boards (Regional Boards) that develop and enforce water quality objectives of the State and implementation plans within their region. The Regional Boards oversee various programs, which protect surface water and groundwater quality, and enforce the federal National Pollutant Discharge Elimination System (NPDES) Wastewater Program, and NPDES Stormwater Program. The Regional Boards are also responsible for developing and implementing Total Maximum Daily Loads (TMDL) for impaired water bodies. The City of San Diego is located within Region 9 and is served by the San Diego Regional Water Quality Control Board.

### ***Urban Water Management Planning Act***

In 1983, the California Legislature enacted the Urban Water Management Planning Act (Water Code Section 10610 to 10656). The Act states that every urban water supplier that provides water to 3,000 or more customers, or that provides over 3,000 acre-feet annually, should make every effort to ensure the appropriate level of reliability in its water service is sufficient to meet the needs of its various categories of customers during normal, dry, and multiple dry years. The Act requires that urban water suppliers adopt and submit an urban water management plan at least once every five years to the Department of Water Resources. Non-compliant urban water suppliers are ineligible to receive funding pursuant to Division 24 (commencing with Section 78500) or Division 26 (commencing with Section 79000), or receive drought assistance from the State until the UWMP is submitted pursuant to the Urban Water Management Planning Act.

### ***Senate Bills (SB) 610 and SB 221***

SB 610 and SB 221 amended State law, effective January 1, 2002, to improve the link between the information on water supply availability and certain land use decisions made by cities and counties. Both statutes require detailed information regarding water availability to be provided to the city and county decision-makers prior to approval of specified large (greater than 500 dwelling units) development projects. Both statutes also require this detailed information to be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Under SB 610, water assessments must be furnished to local governments for inclusion in any environmental documentation for certain projects as defined in Water Code 10912 subject to the California Environmental Quality Act (CEQA).<sup>1</sup> Under SB 221, approval by a city or county of certain residential subdivisions requires an affirmative written verification of sufficient water supply.

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<sup>1</sup> SB 610 water supply assessments are not required for General Plan Updates because they are not “water demand” projects as defined by SB 610. See CEQA Guidelines Section 15155(a)(1).

### ***Senate Bill 7 of the Seventh Extraordinary Session of 2009***

The State Legislature passed Senate Bill 7 as part of the Seventh Extraordinary Session (SBX7-7) on November 10, 2009, which became effective February 3, 2010. SBX7-7 was the water conservation component to the Delta legislation package, and seeks to achieve a 20 percent statewide reduction in urban per capita water use in California by December 31, 2020. The law requires each urban retail water supplier to develop urban water use targets to help meet the 20 percent goal by 2020, and an interim water reduction target by 2015.

Urban retail water suppliers must include in their 2010 UWMPs: (1) baseline daily per capita water use; (2) urban water use target; (3) interim water use target; (4) compliance daily per capita water use, including technical bases and supporting data for those determinations. An urban retail water supplier may update its 2020 urban water use target in its 2015 urban water management plan (Water Code Section 10608.20). Wholesale water suppliers must include in their 2010 Plans an assessment of their present and proposed future measures, programs and policies to help retail agencies achieve their water use reduction targets. (Water Code Section 10608.36).

### ***Title 22 of California Code of Regulations***

Title 22 regulates the use of reclaimed wastewater. In most cases, only disinfected tertiary water may be used on food crops where the recycled water would come into contact with the edible portion of the crop. Disinfected secondary treatment may be used for food crops where the edible portion is produced above ground and would not come into contact with the secondary effluent. Lesser levels of treatment are required for other types of crops, such as orchards, vineyards, and fiber crops. Standards are also prescribed for the use of treated wastewater for irrigation of parks, playgrounds, landscaping and other non-agricultural irrigation. Regulation of reclaimed water is governed by the nine RWQCBs and the CDPH.

### ***Groundwater Management Act (AB 3030)***

Passed in 1992, AB 3030 (California Water Code Sections 10750-10756) provides a systematic procedure for an existing local agency to develop a groundwater management plan. This section of the code provides such an agency with the powers of a water replenishment district to raise revenue to pay for facilities to manage the groundwater basin (extraction, recharge, conveyance, quality).

### ***Sustainable Groundwater Management Act (2014)***

On Sept. 16, 2014, the Sustainable Groundwater Management Act of 2014 (SGMA) was passed. The SGMA provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for State intervention only if necessary to protect the resource.

The act requires the formation of local groundwater sustainability agencies (GSAs) that must assess conditions in their local water basins and adopt locally-based management plans. The act provides substantial time – 20 years – for GSAs to implement plans and achieve long-term groundwater sustainability. It protects existing surface water and groundwater rights and does not impact current drought response measures.



### ***Executive Order B-29-15***

On April 1, 2015, Governor Jerry Brown issued Executive Order B-29-15 to the State Water Resources Control Board to impose restrictions to achieve a statewide 25 percent reduction in potable urban water usage through February 28, 2016. These restrictions require that water suppliers to California's cities and towns reduce usage as compared to the amount used in 2013. The order also includes additional orders including, but not limited to:

- Replace 50 million square feet of lawns throughout the state with drought tolerant landscaping in partnership with local governments;
- Direct the creation of a temporary, statewide consumer rebate program to replace old appliances with more water and energy efficient models;
- Require campuses, golf courses, cemeteries and other large landscapes to make significant cuts in water use; and
- Prohibit new homes and developments from irrigating with potable water unless water-efficient drip irrigation systems are used, and ban watering of ornamental grass on public street medians.

## **Regional**

### ***San Diego Integrated Regional Water Management Plan***

The San Diego Integrated Water Management Plan (IRWMP) was created in response to California's IRWM Planning Act of 2002 (Division 6, Part 2.2 of the Water Code §10530 et seq.), amended in 2008. The first-ever San Diego IRWM Plan was completed in 2007, and submitted to DWR, to coordinate water resource management efforts and to enable the San Diego Region to pursue grant and other funding opportunities. The City, SDCWA, and the County of San Diego formed the Regional Water Management Group (RWMG) in 2005, which has funded, guided and managed the development of the IRWM Program to date. The Regional Advisory Committee (RAC) was formed in December 2006 to assist in the completion of San Diego's 2007 IRWM Plan and prioritization of projects both within the Plan and for future funding application(s) as they arise. An updated San Diego Integrated Regional Water Management Plan was adopted in 2013.

### ***San Diego County Water Authority 2010 Urban Water Management Plan***

The San Diego County Water Authority's (Water Authority) 2010 Urban Water Management Plan (UWMP) was prepared in accordance and compliance with the Urban Water Management Planning Act (Act) (Water Code §10610 through 10656) and includes the conservation measures, programs and policies required by Water Code §10608.36. The plan serves as the Water Authority's long-term planning document to ensure a reliable water supply for the region. The 2010 Plan includes: the Water Authority's climate change mitigation and adaptation strategies; measures, programs, and policies to achieve per capita water use targets as required by Water Code § 10608.36 at both the retail agency level and the Water Authority as a wholesale provider; a discussion on the Water Authority's Integrated Regional Water Management Plan; the Water Authority's Scenario Planning process to deal with future uncertainties in long-range water planning; and details on the 2007-2011 water shortage.

## Local

### ***City of San Diego 2010 Urban Water Management Plan***

The City's 2010 Urban Water Management Plan (UWMP) describes historic and projected water supply and demand scenarios, water supply reliability, water usage trends, current and planned facilities to support demand, current and planned demand management programs, water shortage contingency plans, water recycling efforts, groundwater use, and alternative sources of water (desalting, water transfers, groundwater storage) that the City is considering. The UWMP describes the City's water conservation efforts, which are an important component of the City's overall water supply strategy and the City's efforts at meeting the requirements of SBX7-7. The UWMP also serves as a foundational document for compliance with SB 610 and SB 221 in determining the necessity for a project to complete a water supply assessment.

### ***City of San Diego General Plan***

The following policies from the City of San Diego General Plan, adopted 2008, from the Public Facilities, Services, and Safety Element and Conservation Element are applicable to water supply, treatment, and distribution facilities.

#### **Water Infrastructure**

- PF-H.1 Optimize the use of imported supplies and improve reliability by increasing alternative water sources to: provide adequate water supplies for present uses, accommodate future growth, attract and support commercial and industrial development, and supply local agriculture.
- a. Prepare, implement, and maintain, long-term, comprehensive water supply plans and options in cooperation with the appropriate state and federal agencies, regional authorities, water utilities, and local governments.
  - b. Develop, coordinate, facilitate, and implement water conservation plans and projects that are sustainable in reducing water demands.
  - c. Develop potential groundwater resources and storage capacity, combined with management of surface water in groundwater basins to meet overall water supply and resource management objectives.
  - e. Continue to develop the recycled water customer base, and expand the distribution system to meet current and future demands.
  - f. Consider and evaluate water transfers.
  - g. Optimize storage, treatment and distribution capacity of potable water systems.
- PF-H.2 Provide and maintain essential water storage, treatment, supply facilities and infrastructure to serve existing and future development.
- PF-H.3 Coordinate land use planning and water infrastructure planning with local, state, and regional agencies to provide for future development, maintain adequate service levels, and develop water supply options during emergency situations.
- a. Plan for a water supply and emergency reserves to meet peak load demand during a natural disaster such as a fire or earthquake.

- b. Plan for water supply and emergency reserves recognizing anticipated Climate Change impacts.
- c. Recognize the water/energy nexus. Plan and implement water projects after consideration of their energy demands in coordination with energy suppliers to minimize and optimize the energy impact of projects.

### **Coastal Resources**

- CE-C.7 Encourage conservation measures and water recycling programs that eliminate or discourage wasteful uses of water.

### **Water Resources Management**

- CE-D.1 Implement a balanced, water conservation strategy as an effective way to manage demand by: reducing dependence on imported water supplies; maximizing the efficiency of existing urban water and agricultural supplies through conservation measures/programs; and developing alternative, reliable sources to sustain present and future water needs.
- a. Integrate watershed planning with water supply and land use studies to achieve an integrated approach to ensure that the City can provide adequate water supplies for present uses, accommodate future growth, attract and support commercial and industrial development, and supply local agriculture.
  - b. Manage groundwater and surface water resources and capacity through an integrated approach to meet overall water supply and resource management objectives.
  - c. Participate in advanced water treatment processes such as brackish groundwater and seawater desalination programs.
  - d. Emphasize and refine recycled water programs to help meet non-potable irrigation demands.
  - e. Develop and expand water-efficient landscaping to include urban forestry, urban vegetation, and demonstration projects.
  - f. Support regional efforts towards ensuring that imported water is reliable, cost effective, and is of high quality.
  - g. Maintain existing and future water supply, storage, treatment and distribution facilities with minimal or no impact to the environment.
  - h. Implement conservation incentive programs that increase water-use efficiency and reduce urban runoff.
  - i. Develop a response plan to assist citizens in reducing water use during periods of water shortages and emergencies.
  - j. Encourage local water agencies to use state-mandated powers to enforce conservation measures that eliminate or penalize wasteful uses of water.
  - k. Explore alternative conservation measures and technology as they become available.

- I. Review/update the City's landscaping regulations as needed to ensure they effectively address the efficient use of water in landscaping.
  - m. Educate the public on wise water use.
- CE-D.2 Protect drinking water resources by implementing guidelines for future development that may affect water supply watersheds, reservoirs and groundwater aquifers. The guidelines should address site design, Best Management Practices (BMPs) and storm water treatment measures.
- a. Collaborate with other jurisdictions to reduce the potential for polluted runoff to water supply reservoirs.
  - b. Enter into cooperative, voluntary agreements with other jurisdictions to enable the City to provide advisory review of development projects outside of the City's boundaries that may impact watersheds and reservoirs.
- CE-D.3 Continue to participate in the development and implementation of watershed management plans.
- a. Control water discharge in a manner that does not reduce reasonable use by others, damage important native habitats and historic resources, or create hazardous conditions (e.g., erosion, sedimentation, flooding and subsidence).
  - b. Protect reservoir capacity from sedimentation.
  - c. Improve and maintain drinking water quality and urban runoff water quality through implementation of Source Water Protection Guidelines for New Development.
  - d. Improve and maintain urban runoff water quality through implementation of storm water protection measures.
  - e. Encourage proper sustainable agricultural practices (if applicable) such as tillage, use of grass filter strips, runoff detention basins, and organic farming.
- CE-D.4 Coordinate local land use planning with state and regional water resource planning to help ensure that the citizens of San Diego have a safe and adequate water supply that meets existing needs and accommodates future needs.
- a. Consider and evaluate water transfers and other cost-effective ways to increase reliable supplies with minimal environmental effects, where it benefits the City, to help achieve a balanced and integrated water conservation strategy.

## H.4 Impacts and Mitigation Measures

### Significance Criteria

According to the City of San Diego's CEQA Significance Determination Thresholds, a significant impact with regard to the City's water supply could occur if implementation of the CAP results in the following:

- Use of excessive amounts of water.

## Impacts

As indicated in Table 2-5 in Chapter 2, Project Description, the following proposed CAP actions could have an impact on water supply:

- **Action 1.5 Water Conservation and Disclosure Ordinance.** Supporting measures and steps that support implementation of this action could result in the 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.
- **Action 2.1 Community Choice Aggregation Program or Similar Program.** Supporting measures and steps that support implementation of this action could result in installation of small scale and large scale renewable energy generation, transmission, and storage systems. These could result in the demand for water to serve renewable energy facility needs.
- **Action 3.1 Implement General Plan Mobility Element and City of Villages Strategy in Transit Priority Areas.** These actions would facilitate the implementation of the City of Villages strategy and the shift to greater emphasis on mass transit and other modes of transportation. These actions could, therefore, result in new construction and other physical changes that could result in new or modifications to the existing infrastructure systems to support a more concentrated urban landscape.
- **Action 4.1 Divert Solid Waste and Capture Landfill Emissions.** This action could lead to the implementation of landfill gas collection operational procedures in compliance with the California Air Resources Board's Landfill Methane Capture regulations, as well as new or expanded programs to divert solid waste from landfill disposal. Some of these programs could result in increased demand for water.
- **Action 4.2 Capture Methane from Wastewater Treatment.** Associated actions could result in new or expanded wastewater treatment facilities, such as anaerobic digesters, that could increase demand for water.
- **Action 5.1 Urban Tree Planting Program.** This action aims to achieve 15% urban tree canopy coverage by 2020 and 35% coverage by 2035. The program includes water conservation measures to minimize water use for tree plantings. Includes use of drought-tolerant plantings and native trees and prioritizing planting in areas with recycled water and grey water infrastructure.

### *Issue 1: Would implementation of the CAP result in the excessive use of water?*

The City's UWMP contains information pertinent to planning and securing adequate water supplies to serve the City of San Diego. The UWMP also describes the conservation measures the City is taking to reduce its current and future demand for potable water, which reflects the anticipated population in the City's General Plan. SB 610 and SB 221 require detailed information regarding water availability to be provided to the City and County decision-makers prior to approval of the following types of development projects:

- Residential developments of more than 500 units;

- Shopping centers or businesses employing more than 1,000 people or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 people or having more than 250,000 square feet of floor space;
- Hotels or motels having more than 500 rooms;
- Industrial, manufacturing, or processing plants or industrial parks planned to house more than 1,000 people or having more than 650,000 square feet of floor space;
- Mixed use projects that include one or more of the above types of projects; and
- Projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

Although short-term increases in water demand from CAP-related construction projects could occur, proposed CAP Action 1.4 Water Conservation and Disclosure Ordinance and Action 1.5 Outdoor Landscaping Ordinance, would both have a long-term beneficial effect on water supply by supporting the City's existing water conservation efforts. Action 1.5 would result in more efficient landscape irrigation systems and encourage the installation of landscaping that uses less water. Through the use of recycled and grey water and selection of drought tolerant and low water demand species, long term reduction in water use would result from CAP Strategy 1, Actions 1-3, 1-4, and 1-5.

Action 2.1 of the CAP establishes a goal for the City to supply 100 percent of its electricity needs with renewable sources by 2035 through a community choice aggregation program or similar program, which would leverage the aggregated purchasing power of individual customers to purchase renewable energy on a large scale, and through encouraging local solar photovoltaic (PV) and solar water heater installations. Installation of small scale facilities, such as rooftop photovoltaic panels, would have minimal impacts on existing water supplies. Large scale renewable energy projects, such as solar and wind farms, could involve new, large or extensive facilities such as solar and wind farms. Substantial volumes of water could be required for construction and operation of such facilities. Future development of these large-scale renewable facilities would therefore be required to provide detailed information regarding water use and availability, if they demand an amount of water required by a the development types listed above, as consistent with the requirements of SB 610.

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 are intended to facilitate implementation of major changes to the urban landscape already planned for in the General Plan, Sustainable Communities Strategy, and other planning documents. These changes would result in the development of more dense, built-up, and transit and alternative transportation-oriented development, particularly within the TPAs. The Final Program Environmental Impact Report for the City's 2008 General Plan update (General Plan PEIR) determined that implementation of the General Plan would not result in significant impacts on the water supply because the anticipated demand would not exceed the

expected supply, sufficient alternatives have been identified in case of unanticipated water shortages, and there are multiple conservation efforts underway to reduce the demand.

Implementation of Actions 4.1 and 4.2 would result in alterations to the existing solid waste management system to increase diversion of materials from the landfill and to increase methane capture from landfills and wastewater treatment plants. Such improvements could result in construction activities within the existing footprint of affected landfill and wastewater facilities, and potentially result in short-term increases in demand for water. Some facilities that may be developed pursuant to these proposed actions, such as composting facilities and anaerobic digesters, require use of water for processing; development of these facilities may therefore result in increased demand for water. Any expansions to existing facilities or development of new facilities would be subject to existing City policies and regulations. Impacts to the water supply during construction are considered adverse, but because they are of short duration and extent, the impact on water supply would not be substantial.

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.

### **Significance of Impact**

Most CAP actions would not result in new or more severe impacts on water supply, and would not affect the ability of the City of San Diego or the San Diego County Water Authority's ability to provide water. Development of large-scale renewable energy facilities and other facilities would be required to provide detailed information regarding water use and availability, if they demand an amount of water required by the development types listed above, as consistent with the requirements of SB 610, and as outlined in the Mitigation Framework, below.

### **Mitigation Framework**

**Mitigation Measure WS-1: Water Supply Assessment.** 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.

### **Significance after Mitigation**

Implementation of the Mitigation Measure WS-1 would serve to reduce impacts associated with future development of large-scale renewable energy projects which could demonstrate compliance with SB 610. Therefore, the program-level impact would be reduced to below a level of significance.

# CHAPTER 4

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## History of Project Changes

### A. Project Background

The City of San Diego's first Climate Protection Action Plan (CPAP) was approved in 2005 and focused on the City's mission to reduce emissions from municipal operations. The CPAP was central to fostering heightened awareness and developing "climate change literacy" within the City and the community.

Similarly, the City of San Diego General Plan (General Plan), updated 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 interdisciplinary policies.

In 2010, the City embarked on development of a draft Climate Mitigation and Adaption Plan (CMAP). The draft 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.

### B. CAP

In 2013, the City began work on the Climate Action Plan (CAP). The CAP identifies measures to reduce the City's carbon footprint consistent with General Plan Policy CE-A.2 and updates the City's Climate Protection Action Plan consistent with General Plan Policy CE-A.13.

Three versions of the CAP have been released for public review (February 2014, September 2014, and March 2015). Each version of the CAP contained edits and changes, but kept the main focus of achieving GHG emissions reductions through five strategies: Energy and Water Efficient Buildings; Clean and Renewable Energy Resources; Biking, Walking and Transit; Zero Waste Management; and Climate Resiliency. Each version of the CAP has included goals and Actions to achieve GHG reductions in 2020 and 2035. The March 2015 version of the CAP included appendices outlining the calculations used to determine the GHG emissions reductions from each action and a map of Transit Priority Areas.

With the release of this Draft PEIR, the City of San Diego has also completed the July 2015 version of the CAP. Revisions to the CAP in the July 2015 version include adding text and calculations to demonstrate compliance with Executive Order B-30-15. The July 2015 version



includes a CAP Consistency Checklist to provide a streamlined review process for the GHG emissions analysis of proposed new development projects subject to discretionary review and trigger environmental review under CEQA. The July 2015 CAP also includes a companion document, Draft Greenhouse Gas Emissions Screening Criteria, to determine whether or not development projects have a significant impact on the environment.

City Staff intended to have the CAP Consistency Checklist and Draft Greenhouse Gas Emissions Screening Criteria (Screening Criteria) brought forward with the CAP, but during public review, City Staff received substantial comments including disagreements with the methodologies and science and regarding a lack of specificity used in developing the CAP Consistency Checklist and Screening Criteria. As such, a decision was made to move forward with the CAP alone. City Staff will continue to work on the CAP Consistency Checklist and a GHG Emissions Threshold to address the noted concerns and present them for City Council consideration in 2016.

For the Adoption Draft of the CAP (December 2015), the GHG emissions baseline, state and local targets, and forecasted reductions numbers have been updated to reflect the most up-to-date modeling and GHG reduction methodology. The CAP Appendices have been updated as well to clarify how these numbers were determined.

## **C. CAP PEIR**

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 PEIR, and a public scoping meeting was held on March 2, 2015. Subsequent to the NOP, City staff determined during project review to add analysis of historical resources (archaeology) to Section 3.E, Historical Resources. This section now includes archaeological resources impact analysis, and Mitigation Framework HIST-1.

Changes made to the CAP since the release of the Draft PEIR are reflected in the Final PEIR in ~~strikeout~~/underline.

# CHAPTER 5

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## Growth Inducement

### A. Introduction

The CEQA *Guidelines* Section 15126.2(d) requires that an EIR evaluate the growth-inducing impacts of a proposed action. A growth-inducing impact is defined by the CEQA *Guidelines* as:

*[T]he ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth ... It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.*

The following sections address these issues as they relate to implementation of the proposed project.

### B. Growth Inducing Effects of the Proposed Project

A project can have direct and/or indirect growth-inducement potential. Direct growth inducement would result if a project involved construction of new housing. A project can have indirect growth-inducement potential if it would establish substantial new permanent employment opportunities (e.g., commercial, industrial or governmental enterprises) that would encourage development of new housing for employees, or if it would involve a substantial construction effort creating short-term employment opportunities. Similarly, under CEQA, a project would indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service. Infrastructure projects could also indirectly stimulate growth by enhancing access to properties, or increasing their desirability for development.

Increases in population could tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. The CEQA *Guidelines* also require analysis of the characteristics of projects that may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

The timing, magnitude, and location of land development and population growth are based on various interrelated land use and economic variables. Key variables include regional economic trends, market demand for residential and non-residential uses, land availability and cost, the availability and quality of transportation facilities and public services, proximity to employment centers, the supply and cost of housing, and regulatory policies or conditions. Since a general plan

defines the location, type and intensity of growth, it is the primary means of regulating development and growth in California.

~~As discussed in Chapter 2, Project Description, the CAP includes a CAP Consistency Checklist to provide a streamlined review process for the GHG emissions analysis of proposed new development projects that are subject to discretionary review and trigger environmental review under CEQA. The use of the CAP Consistency Checklist does not remove the requirement to analyze any other potential environmental impact required under CEQA for a proposed new development project and therefore the Checklist is not considered to contribute to a growth-inducing impact.~~

## Growth from the Proposed Project

The City of San Diego's General Plan (2008) provides land use development patterns and growth policies that allow the planned and orderly expansion of development supported by adequate public services. A project that would induce unplanned growth could indirectly cause additional adverse environmental and public services impacts not previously envisioned. To assess whether implementation of the CAP will result in growth inducing effects beyond what is currently anticipated by the City of San Diego, this PEIR must analyze the degree to which the growth associated with implementation of the CAP would be consistent with the General Plan.

The Final Program Environmental Impact Report for the City's 2008 General Plan update (General Plan PEIR) discussed the growth-inducing impacts of the General Plan in *Chapter 4, Growth Inducement*. The detailed discussion provided in the General Plan PEIR is fully incorporated into this PEIR by this reference. The General Plan PEIR found that implementation of the General Plan is growth accommodating in that it provides direction for the planning and management of population growth, and growth inducing in that it facilitates economic expansion and may result in infrastructure improvements (i.e. water, sewer, circulation systems) that could further remove existing obstacles to growth.

The General Plan provided goals and policies for redevelopment, infill, and new growth in compact, mixed-use activity areas that are pedestrian-friendly, center of community, and linked to the regional transit system. The SANDAG Sustainable Communities Strategy (SCS) relies on this type of development to reduce vehicle miles traveled, and thus GHG emissions in their effort to meet the requirements of SB 375.

The CAP would not revise the General Plan Planning Area or sphere of influence, and through the year 2020 would not allow additional development compared to the amount disclosed in the General Plan PEIR. Importantly, CAPs are not, by their nature, growth inducing. The CAP provides a framework for reducing greenhouse gas emissions from existing and future development that has previously been planned for in the General Plan. The CAP relies on the intensification of land uses around Transit Priority Areas and this growth has already been accounted for in the General Plan and SCS.

The CAP actions promote the internal relationship of mutually supportive uses in transit-oriented areas so as to decrease dependency on the automobile, encourage alternative transportation modes, make efficient use of land and infrastructure, reduce energy consumption, and promote sustainability.

The specific environmental effects resulting from the implementation of the CAP are discussed in the environmental issue areas in Chapter 3, Environmental Setting, Impacts, and Mitigations. The CAP would not, on its own, induce population growth in the City of San Diego, beyond that already identified in the General Plan PEIR. As a result, the proposed project is not considered to be growth-inducing.

The specific environmental effects resulting from the direct growth effects of proposed land use patterns and associated extension and/or improvement of public services by the year 2020 are discussed in Chapter 3, Sections 3.A through 3.H, of this Draft PEIR. The following is a discussion of the growth-inducing effects of implementing the CAP.

## **Employment Growth**

The CAP notes that there are considerable economic benefits in implementing CAP strategies, including promoting job creation through capital improvements and corresponding research, develop and innovation. The CAP does not estimate the number of jobs that would be created, but notes that implementation of the CAP strategies could create jobs in wind, solar, biofuels, and transportation.

Implementation of the CAP would provide a small number of temporary construction jobs to retrofit existing development or construct new energy-generating structures. It is likely that the majority of these positions would be filled from the existing labor pool in and around the City of San Diego. Therefore, the creation of new jobs is not expected to result in a substantial increase in the demand for additional housing or services, and is not expected to be growth-inducing. The CAP facilitates development in Transit Priority Areas that have already been planned for. The growth-inducing and growth-accommodating tendencies of these developments have already been considered in the General Plan PEIR, and the CAP would not add to or increase these effects.

## **Growth Effects Associated with Infrastructure Improvements**

The future development facilitated by a proposed project could indirectly induce growth if it would remove an obstacle to additional growth and development, such as removing a constraint on a required public service.

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.

The CAP does not propose development other than what is already identified in the General Plan, and would not induce growth in an area that is not already developed with infrastructure to accommodate such growth. It does not call for the construction of major new roadways or utility systems in undeveloped areas that would stimulate development in those undeveloped areas. Further, while certain project elements may require the construction of solar panel systems, alternative transportation infrastructure, waste management facilities, and retrofitting buildings, these project elements would improve existing resources, and would not create infrastructure to serve new development.

Thus, the proposed project would not induce growth by removing infrastructure barriers or by providing infrastructure to serve new development, nor would it create new transportation access to a previously inaccessible area.

## **C. Environmental Effects of Growth**

As described above, the CAP would not, in itself, induce population growth in the City, although it would allow for more growth in the “green job” employment field. However, the CAP is not considered to be growth-inducing as it only projects the growth anticipated by the General Plan.

# CHAPTER 6

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## Cumulative Impacts

### A. Introduction

The term “cumulative impacts,” as defined in §15355 of the CEQA *Guidelines*, refers to two or more individual effects that, when taken together, are “considerable” or compound or increase other environmental impacts. A cumulative impact from multiple projects is the change in the environment that could result from the incremental impact of the Project when added to other closely related past, present, and reasonably foreseeable (i.e., probable) future projects. CEQA *Guidelines* §15130 provides pertinent guidance for cumulative impact analysis:

- An EIR shall discuss the cumulative impacts of a project when the project’s incremental effect may be individually limited, but “cumulatively considerable,” meaning that the project’s incremental effects are significant when viewed in connection with the effects of past, current, and probable future projects. An EIR should not discuss impacts that do not result in part from the Project evaluated in the EIR.
- A project’s contribution is less than cumulatively considerable, and thus not significant, if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact.
- The focus of the analysis should be on the cumulative impact to which the identified other projects contribute, rather than on attributes of the other projects that do not contribute to the cumulative impact.

Two approaches to a cumulative impact analysis are provided for in CEQA *Guidelines* §15130(b)(1): (a) the analysis can be based on a list of past, present, and probable future projects producing related or cumulative impacts; or (b) a summary of projections contained in a general plan or related planning document or in an adopted or certified prior environmental document that described or evaluated regional or area wide conditions contributing to the cumulative impact. For the purpose of this EIR, the analysis employs the plan-based approach, as described in the following section.

### B. Projects with Potential Cumulative Impacts

The cumulative setting conditions considered in this PEIR is the policies, programs, and land use designations contained in the City of San Diego General Plan (2008). Other relevant plans or programs also considered in the cumulative analysis include the City’s community plans, the SANDAG Regional Transportation Plan, the Pure Water Program, and the Downtown Mobility

Specific Plan, as described below. The PEIR cumulative analysis focuses on whether there is a significant cumulative impact from one or more of these plans in combination with the CAP, and whether the CAP's incremental effect would be cumulatively considerable.

## City of San Diego General Plan

The City's General Plan, updated in 2008, sets out a long-range vision and comprehensive policy framework for how the City should grow and develop, provide public services, and maintain the qualities that define San Diego over the next 20 to 30 years. It provides a strategy, the City of Villages, for how the City can enhance its many communities and neighborhoods as growth occurs over time. The City of Villages strategy focuses growth into mixed use activity centers that are pedestrian-friendly districts linked to an improved regional transit system. The strategy draws upon the character and strengths of San Diego's natural environment, neighborhoods, commercial centers, institutions, and employment centers. The strategy is designed to sustain the long-term economic, environmental, and social health of the City and its many communities. It recognizes the value of San Diego's distinctive neighborhoods and open spaces that together form the City as a whole.

A "village" is defined as the mixed-use heart of a community where residential, commercial, employment, and civic uses are all present and integrated. Each village will be unique to the community in which it is located. All villages will be pedestrian-friendly and characterized by inviting, accessible and attractive streets and public spaces. Public spaces will vary from village to village, consisting of well-designed public parks or plazas that bring people together. Individual villages will offer a variety of housing types affordable for people with different incomes and needs. Over time, villages will connect to each other via an expanded regional transit system.

## Local Community Plans

The City has 52 community planning areas and 48 community plans. These community plans are an integral part of the General Plan as they provide more detailed land use designations, focused policies, and implementation recommendations that work to further implement City-wide and community goals. Since the General Plan was updated in 2008, the City Council has adopted new community plans for Barrio Logan, Otay Mesa and Ocean Beach. The Otay Mesa Community Plan update is currently in effect, the Ocean Beach Community Plan is awaiting California Coastal Commission certification, and the Barrio Logan Community Plan was repealed by voter referendum. The City's Planning Department is currently updating the San Ysidro, Southeastern, Encanto, Uptown, North Park, Golden Hill, Midway, Old Town, and Mission Valley plans. In addition, a Focused Plan Amendment was recently completed for the Grantville section of the Navajo Community Plan.

## SANDAG 2050 Regional Transportation Plan and Sustainable Communities Strategy

The 2050 Regional Transportation Plan and Sustainable Communities Strategy (2050 RTP/SCS), adopted by SANDAG in 2011, presents a transportation system designed to maximize transit enhancements, integrate biking and walking elements, and promote programs to reduce demand and increase efficiency. One key theme of the Regional Transportation Plan (RTP) is to improve the connections between land use and transportation plans by using smart growth principles. The 2050 RTP includes a Sustainable Communities Strategy (SCS) that integrates land use planning, housing development, and transportation planning. The SCS also addresses how the transportation system will be developed in such a way that the region reduces per-capita GHG emissions to state-mandated levels. The SCS identifies a land use pattern that accommodates the region's future employment and housing needs, and protects sensitive habitats and resource areas. To accomplish this in a sustainable manner, the 2050 RTP/SCS land use pattern focuses housing and jobs growth in existing urbanized areas, protects about 1.3 million acres of land, and invests in a transportation network that provides residents and workers with alternatives to driving alone. Further, new development would be more compact and more accessible to public transit and other travel choices, such as walking and bicycling. SANDAG issued the Draft San Diego Forward Regional Plan, a plan that combines the Regional Comprehensive Plan (RCP) and the RTP/SCS into one Regional Plan, on April 2015 for public review and comment.

## City of San Diego Pure Water Program

Pure Water San Diego is the City's 20-year program to provide a safe, reliable and cost-effective drinking water supply for San Diego. Program components include the construction of water purification facilities, continued operation of the test Advanced Water Purification Facility, research on additional treatment barriers for a potential direct potable reuse project, regulation and legislation development, and an education and outreach program. An initial 15-million gallon per day water purification facility is planned to be in operation by 2023. The long-term goal, producing 83 million gallons of purified water per day (one third of San Diego's future drinking water supply), is planned to be reached by 2035. The Program will divert approximately 100 MGD of wastewater from Point Loma to three future advanced water purification facilities located at the North City Water Reclamation Plant, South Bay Water Reclamation Plant and a future central area facility.

## Downtown San Diego Mobility Plan

The Downtown San Diego Mobility Plan ("Mobility Plan") establishes policies, programs and projects that will improve overall mobility throughout the Downtown San Diego area. The Mobility Plan provides for the development of a cohesive network of complete streets, which will 1) increase priority and safety for bicyclists and pedestrians by providing supportive facilities and amenities; 2) provide desirable connections for all users to public parks, main shopping areas, entertainment facilities, major attractions, the waterfront, surrounding communities, and the



regional transportation network; and 3) support reductions in greenhouse gas emissions. Adoption of the Plan is expected in the summer of 2015.

## C. Cumulative Impact Analysis

The affected area for the cumulative impacts analysis is the City of San Diego as described in the General Plan, and as outlined in Chapter 1, Introduction and Environmental Setting, and shown on Figure 2-1. As discussed in Chapter 3, Environmental Impacts and Mitigation Measures, implementation of the CAP would result in few significant impacts, other than those previously identified in the City of San Diego General Plan PEIR. These include significant impacts to visual effects and neighborhood character; air quality; historical resources; utilities, and transportation and circulation. While the CAP proposes several actions that would mitigate air quality and transportation impacts, including Action 3.2 Implement the City's Pedestrian Master Plan in Transit Priority Areas, Action 3.3 Implement the City's Bicycle Master Plan, Action 3.4 Implement a Traffic Signal Master Plan, and Action 3.5 Implement a Roundabouts Master Plan, the analyses in Chapter 3 conclude that these mitigating actions would not be sufficient to reduce impacts related to implementation of the City of Villages strategy to less than significant. In addition, proposed 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 facilitate and intensify development within the Transit Priority Areas. The intensification of development (e.g. higher density development) could result in greater population in a given area, with taller buildings or buildings with greater massing, which may potentially exacerbate the significant impacts already identified in the General Plan EIR. Therefore, CAP Actions 3.1 and 3.6 could contribute to cumulatively significant impacts in the areas of visual effects and neighborhood character; air quality; historical resources; utilities, and transportation and circulation associated with implementation of the City of Villages strategy, and the CAP's incremental effect could be cumulatively considerable in these areas. However, the potential for significant unavoidable impacts associated with implementation of the City of Villages strategy have already been identified in the General Plan PEIR. CAP Actions 3.1 and 3.6 would not change or exacerbate these impacts. Therefore, for the purpose of this PEIR, the cumulative impacts associated with the City of Villages strategy are considered less than significant.

Potential cumulative impacts to land use, visual resources and neighborhood character, air quality, and greenhouse gas emissions may be associated with development of large-scale renewable energy facilities as a result of CAP Action 2.1 Community Choice Aggregation Program or Another Program, when viewed cumulatively with the impacts of the plans listed above. These impacts, however, would be reduced to less than significant through implementation of Mitigation Measure LU-1 (see Section 2.A, Land Use), which would establish siting guidelines and a process for ensuring appropriate siting of such facilities.

Other CAP Actions identified as having the potential for cumulative impacts are those that could result in development of new or expanded facilities for reduced water consumption, waste recycling, and methane recovery facilities, and that call for increased frequency of recycling and

organic waste collection programs (CAP Action 1.3: Support water rate structures that provide pricing signals that encourage water conservation and reuse, Action 1.5: Outdoor Landscaping Ordinance, Action 4.1 Divert Solid Waste and Capture Landfill Emissions, and Action 4.2 Capture Methane from Wastewater Treatment). Potentially significant cumulative impacts related to Action 4.1 include cumulative impacts to air quality and GHG emissions, but these would be mitigated to less than significant with Mitigation Measure AIR-1 that requires use of low-emission alternative fuels in trucks. Other CAP Actions may result in site-specific impacts with a low potential to contribute to cumulative effects such as energy efficiency retrofits (Action 1.1 Present to City Council for consideration a Residential Energy Conservation and Disclosure Ordinance; Action 1.2 Present to City Council for consideration a Municipal Energy Strategy and Implementation Plan) to existing buildings, low-water landscaping, (Action 1.5: Outdoor Landscaping Ordinance) and minor changes to streetscapes to better accommodate pedestrians and bicycles. These Actions would result in small, diffuse, and generally low-impact changes and therefore would not contribute to cumulatively significant impacts.

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# CHAPTER 7

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## Other CEQA Considerations

### A. 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 City of San Diego Climate Action Plan (CAP) Project were determined not to be significant and are therefore not discussed in detail in this PEIR. In accordance with the CEQA *Guidelines*, 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.

### Agricultural Resources

***Threshold: Would the Project result in the conversion of a substantial amount of Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?***

Within the City of San Diego, there are about 15,900 acres of land designated for agricultural uses, representing only about one percent of the City's total land area of 219,241 acres. The majority of agricultural production in the City is located in San Pasqual Valley (approximately 14,000 acres), in Otay Mesa, and in the Tijuana River Valley. These areas include lands designated as Prime Farmland, Unique Farmland, and Farmland of Statewide Importance. Many of the CAP Actions include activities that would take place in urban and developed areas, for example disclosing the energy efficiency of residential buildings (Action 1.1 Present to City Council for consideration a Residential Energy Conservation and Disclosure Ordinance), modification of transportation facilities such as re-timing traffic signals or installing roundabouts (Action 3.4 Implement a Traffic Signal Master Plan to retime traffic signals to reduce vehicle fuel consumption and Action 3.5 Implement a Roundabouts Master Plan to install roundabouts to reduce vehicle fuel consumption), and expansion of bicycle commuter amenities (Action 3.3 Implement the City of San Diego's Bicycle Master Plan to increase commuter bicycling opportunities). As a result, these Actions would not result in the conversion of farmland.

Action 2.1 of the CAP targets achievement of a 100 percent renewable supply of electricity by 2035 through consideration of a Community Choice Aggregation (CCA) or other program. As stated in the Land Use section of this PEIR (Section 3.A), this may encourage or facilitate the development of larger renewable energy systems including large-scale solar PV and solar thermal

facilities; on- and off-shore wind turbines, tidal and water power systems, geothermal systems, and hydropower systems; and biomass systems; as well as new or upgraded transmission lines, substations, and energy storage systems. In general, larger-scale renewable energy facilities within the City's limits would be located in industrial areas, industrial brownfields, and near existing utility infrastructure. This would include areas designated in the City's General Plan (2008) for industrial uses, institutional, public, and semi-public facilities, and military uses. Therefore, no substantial loss of agricultural lands would be expected within City limits since these facilities would generally be located outside of agricultural lands.

Outside of the City limits, development of large-scale renewable energy facilities may occur on private or public lands, including land designated for agricultural use. Such developments could be proposed for locations with general plan or zoning designations incompatible with facilities of this kind. In such cases, it would be the responsibility of the agency with land use authority over the project site to ensure that developments were compatible with existing designations or zoning, or that no construction of large-scale renewable energy facilities would convert any farmlands of statewide significance to non-agricultural use. Therefore, the loss of agricultural lands either would not occur, or would be resolved by the local agency. In either case, it is anticipated that the loss or conversion of farmlands will be considered in the planning and environmental review process for proposed facilities.

The CAP has been prepared to be consistent with the City's General Plan, and supports implementation of the City's General Plan to achieve better walkability and transit-supportive densities. The City's General Plan calls for infill and redevelopment of areas with existing development. The resulting intensification within selected urbanized areas is expected to reduce development pressures on vacant and undeveloped land including farmland. For these reasons, the adoption and implementation of the CAP would not result in the conversion of farmland to non-agricultural uses, and no significant impact would occur.

***Threshold: Would the Project conflict with existing zoning for agricultural use, or Williamson Act contract?***

Many of the Actions included in the CAP would involve modifications to existing structures and facilities in developed areas (Action 1.1 Present to City Council for consideration a Residential Energy Conservation and Disclosure Ordinance, Action 1.2 Present to City Council for consideration a Municipal Energy Strategy and Implementation Plan, Action 1.4 Present to City Council for consideration a Water Conservation and Disclosure Ordinance, and Action 1.5 Implement an Outdoor Landscaping Ordinance that requires use of weather-based irrigation controllers), and would support City plans and policies calling for intensification within urbanized areas (Action 3.1 Implement the General Plan's Mobility Element and the City of Villages Strategy in Transit Priority Areas to increase the use of Transit); therefore, those Actions would not result in conflicts with existing zoning for agricultural use. Development of larger renewable energy systems that could result from implementation of Action 2.1 (Present to City Council for consideration a CCA or another program that increases the renewable energy supply on the electrical grid) would likely occur within the City's jurisdictional limits in industrial areas and near existing utility infrastructure; therefore, they are also not likely to conflict with existing

agricultural zoning. Additionally, the City of San Diego does not contain land subject to a Williamson Act contract. For these reasons, the implementation of the CAP would not result in a conflict with existing zoning for agricultural use or Williamson Act contracts within the City's jurisdiction, and no impact would occur. As stated above, development of larger-scale renewable energy facilities may occur outside the City's jurisdictional limits. Potential land use conflicts with lands zoned for agricultural use or Williamson Act contracts either would not occur, or would be resolved by the local agency. It is anticipated that impacts to agricultural lands will be considered in the planning and environmental review process for proposed facilities and therefore these potential impacts were determined to not be significant.

***Threshold: Would the project involve other changes in the existing environment which due to their location or nature, could result in conversion of Farmland, to non-agricultural use?***

For the reasons stated above, the implementation of the CAP would not result in the conversion of farmland to non-agricultural uses for Actions occurring within the City's jurisdictional limits, and no impact would occur. The conversion of farmland to non-agricultural use could occur for large-scale renewable energy projects occurring outside the City's limits. However, as these impacts would be subject to further review in the planning and environmental review process for the proposed facilities, these potential impacts were determined to not be significant.

## Biological Resources

***Threshold: Would the Project have a substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS)?***

The Conservation Element of the City's General Plan includes policies intended to maintain and enhance biodiversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats. The CAP has been prepared to be consistent with the City's General Plan, and implementation of CAP Actions would be subject to policies included in the General Plan Conservation Element. Additionally, implementation of the CAP as a component of a specific project would be subject to all applicable regulations regarding sensitive species, including the City's adopted Multiple Species Conservation Program (MSCP) Subarea Plan, Environmentally Sensitive Lands (ESL) ordinance, and Land Development Code Biology Guidelines, as well as applicable regulations of the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Projects implemented pursuant to the CAP Actions would primarily take place in urban and developed areas and would not generally require new areas of ground disturbance. Implementation of the CAP would also involve disclosing the energy efficiency of residential buildings (Action 1.1 Present to City Council for consideration a Residential Energy Conservation and Disclosure Ordinance, modification of transportation facilities (Action 3.4 Implement a Traffic Signal Master Plan to retime traffic signals to reduce vehicle fuel consumption and Action 3.5 Implement a Roundabouts Master Plan to install roundabouts to reduce vehicle fuel consumption), and expansion

of infrastructure supporting alternative modes of transportation like bicycles (Action 3.3 Implement the City of San Diego's Bicycle Master Plan to increase commuter bicycling opportunities). The CAP also supports implementation of City plans and policies that are intended to achieve better walkability and transit-supportive densities. The resulting intensification within selected urbanized areas is expected to reduce development pressures on vacant and undeveloped land, and therefore not result in impacts to sensitive species habitat. Therefore, implementation of CAP Actions that are confined to existing urban areas is not expected to have a substantial adverse impact on any species identified as a candidate, sensitive or special status species.

New infrastructure may be necessary for increased solid waste diversion programs to achieve zero waste under CAP Action 4.1, or for increased methane capture at wastewater treatment plants under CAP Action 4.2. It is anticipated that new infrastructure associated with implementation of these CAP Actions, such as footings or pipelines, would be located within the existing disturbed footprint of the facility and would not generally require new ground disturbance. Development of new facilities, such as composting facilities or material recovery facilities, that may involve disturbance of previously undisturbed ground, would be subject to existing policies and regulations intended to protect biological resources. Projects of this kind and scale would also be subject to project-level CEQA review, which would examine the potential for impacts to biological resources.

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.

Outside of the City limits, development of large-scale renewable energy facilities may occur on private or public lands. Such developments could be proposed for locations within the boundaries of adopted habitat conservation plans or other environmental plans. In such cases, it would be the responsibility of the agency with land use authority over the project site to ensure that such

developments were compatible with the requirements of any such plans. Therefore, conflicts either would not occur, or would have to be resolved by the local agency. In either case, it is anticipated that any impacts on sensitive biological resources would be identified and mitigated through the planning process for proposed facilities and therefore would not have a substantial adverse impact on any species identified as a candidate, sensitive or special status species.

In summary, most CAP actions do not have the potential to result in adverse impacts to sensitive species and their habitats. Where such a potential does exist, projects undertaken pursuant to CAP actions would be required to adhere to existing policies and regulations, and would also be subject to further environmental review. Therefore, at the program level, the CAP would not have a significant effect on sensitive species and their habitats.

***Threshold: Would the Project have a substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?***

Because CAP strategies and actions would primarily take place in urban and developed areas, and because associated infrastructure would be located within the disturbed footprint of existing facilities, impacts on Tier I, Tier II, Tier IIIA and Tier IIIB habitats or other sensitive natural communities are not expected as a result of implementation of the CAP. Implementation of the CAP as a component of a specific project would also be subject to policies included in the General Plan's Conservation Element, as well as other local, state and federal regulations regarding sensitive habitats. For these reasons, implementation of the CAP would not result in a substantial adverse impact on any Tier I, Tier II, Tier IIIA and Tier IIIB habitats, or other identified sensitive natural communities.

***Threshold: Would the Project have a substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?***

CAP Actions would primarily take place in urban and developed areas, and associated infrastructure would be located within the disturbed footprint of existing facilities. Therefore, impacts on wetlands are not expected as a result of implementation of the CAP. Implementation of the CAP as a component of a specific project would also be subject to policies included in the General Plan's Conservation Element, as well as other local, state and federal regulations regarding wetlands, including applicable regulations of the U.S. Army Corps of Engineers. For these reasons, implementation of the CAP would not result in a substantial adverse impact on wetlands.

***Threshold: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites?***

It is unlikely that implementation of the CAP Actions would impact wildlife movement or migration or impede native wildlife nursery sites, because CAP Actions would primarily take



place in urban and developed areas, and associated infrastructure would be located within the disturbed footprint of existing facilities. Implementation of the CAP as a component of a specific project would be subject to all applicable regulations regarding animal species and habitats, including the City's adopted MSCP Subarea Plan, which includes identification of wildlife corridors as part of the regional planning effort. In addition, implementation of the CAP would be subject to the Migratory Bird Treaty Act (MBTA), which prohibits taking, killing, possessing, transporting, and importing of migratory birds, parts of migratory birds, and their eggs and nests, except when specifically authorized by the Department of the Interior. For these reasons, implementation of the CAP would not result in a substantial adverse impact on wildlife movement, wildlife corridors, and wildlife nursery sites.

***Threshold: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region?***

Implementation of the CAP would not result in conflicts with the provisions of the MSCP or other approved local, regional or state habitat conservation plan because CAP Actions would primarily take place in urban and developed areas, and associated infrastructure would be located within the disturbed footprint of existing facilities. Additionally, implementation of the CAP as a component of a specific project within or adjacent to a habitat conservation plan area would be subject to all provisions and requirements associated with that plan, further minimizing any potential for conflict. For these reasons, implementation of the CAP would not result in a substantial adverse impact regarding conflicts with habitat conservation plans.

Outside of the City limits, development of large-scale renewable energy facilities may occur on private or public lands. Such developments could be proposed for locations within the boundaries of adopted habitat conservation plan areas or other approved local, regional, or state habitat conservation plan areas. In such cases, it would be the responsibility of the agency with land use authority over the project site to ensure that such developments were compatible with the requirements of any such plans. Therefore, conflicts either would not occur, or would be resolved by the local agency. In either case, it is anticipated that any impacts on sensitive biological resources would be identified and mitigated through the planning process and would not result in a substantial adverse impact regarding conflicts with habitat conservation plans.

***Threshold: Would the Project introduce land use within an area adjacent to the MHPA that would result in adverse edge effects?***

Policies incorporated into the City's General Plan result in infill and redevelopment of areas with existing development and therefore lessen development pressure on vacant or sensitive areas. The General Plan was designed to avoid adjacency concerns with the City's MHPA. Nevertheless, if development did occur on undeveloped lands, the CAP Actions would not be expected to cause adverse edge effects in addition to those already associated with development. For these reasons, implementation of the CAP would result in a less-than-significant impact regarding adverse edge effects on the MHPA.

***Threshold: Would the Project result in a conflict with any local policies or ordinances protecting biological resources?***

Implementation of the CAP would not conflict with General Plan Conservation Element policies, the MSCP Subarea Plan, ESL ordinance, or Land Development Code Biology Guidelines. Therefore implementation of the CAP would not result in a conflict with any local policies or ordinances protecting biological resources.

***Threshold: Would the Project introduce invasive species of plants into a natural open space area?***

Implementation of CAP Actions would comply with the City's General Plan Conservation Element, which includes a policy that encourages the removal of invasive plant species and the planting of native plants near open space preserves. In addition, implementation of the CAP as a component of a specific project would be required to comply with MHPA Land Use Adjacency Guidelines for drainage, toxics, lighting, noise, barriers, invasive species and brush management, as identified in the MSCP Subarea Plan. For these reasons, implementation of the CAP would result in a less-than-significant impact regarding introduction of invasive species of plants into a natural open space area.

## Geologic Conditions

***Threshold: Would the Project expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?***

Southern California is considered one of the most seismically active regions in the United States, with numerous active faults and a history of destructive earthquakes. The entire San Diego region is susceptible to impacts from seismic activity, including earthquakes and ground-shaking events. The Actions included in the CAP are intended to reduce community-wide greenhouse gases (GHGs) by improving building efficiency, increasing renewable energy use, and improving multimodal transportation options, among other similar actions. Implementation of these strategies and actions would not directly affect the potential to expose people or structures to adverse effects resulting from geologic hazards such as earthquakes, landslides, mudslides, or ground failure.

Implementation of the CAP may include disclosing the energy efficiency of residential buildings (Action 1.1 Present to City Council for consideration a Residential Energy Conservation, Benchmarking, and Disclosure Ordinance), modification of transportation facilities such as re-timing traffic signals or installing roundabouts (Action 3.4 Implement a Traffic Signal Master Plan to retime traffic signals to reduce vehicle fuel consumption and Action 3.5 Implement a Roundabouts Master Plan to install roundabouts to reduce vehicle fuel consumption), and expansion of bicycle commuter amenities (Action 3.3 Implement the City of San Diego's Bicycle Master Plan to increase commuter bicycling opportunities). Projects implementing CAP Actions would be subject to all relevant federal, state, and local regulations and building standards, including the California Building Code (CBC) and the City's grading ordinance. Required conformance with the City's grading ordinance, and all seismic requirements that are outlined within the CBC, reduce the potential for hazards due to earthquakes. Therefore, implementation

of the CAP would not be expected to expose people or structures to potential substantial adverse effects involving earthquakes, and risks related to these hazards would be less than significant.

Slope failure results in landslides and mudslides from unstable soils or geologic units. Geologic hazards, including landslides, are regulated mainly by the CBC and the City's grading ordinance. The CBC requires special foundation engineering and investigation of soils on proposed development sites located in geologic hazard areas. All projects are required to adhere to California design standards and all standard design, grading, and construction practices to avoid or reduce geologic hazards. Implementation of the CAP as a component of a specific project would be required to conform to the City's grading ordinance and other local geologic hazard regulations, as well as all requirements outlined within the CBC, would reduce potential for hazards due to landslides. Therefore, implementation of the CAP would not be expected to expose people or structures to increased potential substantial adverse effects involving landslides, and risks associated with landslides would be less than significant.

***Threshold: Would the Project result in a substantial increase in wind or water erosion of soils, either on or off the site?***

High erosion potential in soils is primarily caused by loose soils and steep slopes. The potential for erosion generally increases as a result of the development of structures and impervious surfaces and the removal of vegetative cover. Implementation of the CAP as a component of a specific project would be subject to the City's grading ordinance, and other applicable regulations, including the National Pollutant Discharge Elimination System (NPDES) and the CBC, which contain policies to reduce erosion potential. Required conformance to the City's grading ordinance and other local geologic hazard regulations, as well as all regulatory requirements, would reduce potential for erosion and loss of topsoil, and result in a less-than-significant impact.

Construction of new infrastructure projects as part of CAP Actions have the potential for a short-term increase in wind or water erosion of soils; however, it is expected that adherence to existing standard best management practices (BMP) during construction would reduce these temporary impacts from wind or water erosion on soils to less than significant levels.

***Threshold: Would the Project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?***

Geologic hazards, including landslides, are regulated mainly by the CBC and the City's grading ordinance. Required conformance to the City's grading ordinance and other local geologic hazard regulations, as well as requirements included in the CBC, would reduce the potential for hazards due to unstable soil conditions. Therefore, implementation of CAP Actions as a component of a specific project would not be expected to result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, and risks related to unstable soil conditions would be less than significant.

## Health and Safety and Hazardous Materials

***Threshold: Would the Project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including when wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?***

Due to climate, topography, and native vegetation, the City of San Diego is subject to both wildland and urban fires. Current drought conditions in the State of California have both increased the risk of wildland fires due to dry conditions, and prompted the implementation of water conservation strategies. Implementation of CAP Actions is not likely to occur in areas where people or structures would be exposed to a significant risk of wildland fires, because they would primarily take place in urban and developed areas. Implementation of the CAP may include disclosing the energy efficiency of residential buildings (Action 1.1 Present to City Council for consideration a Residential Energy Conservation and Disclosure Ordinance), modification of transportation facilities such as re-timing traffic signals or installing roundabouts (Action 3.4 Implement a Traffic Signal Master Plan to retime traffic signals to reduce vehicle fuel consumption and Action 3.5 Implement a Roundabouts Master Plan to install roundabouts to reduce vehicle fuel consumption), and expansion of bicycle commuter amenities (Action 3.3 Implement the City of San Diego's Bicycle Master Plan to increase commuter bicycling opportunities). Projects implementing CAP Actions would not have an increased likeliness of exposing people or structures to urban fires including fires in areas where urbanized areas are adjacent to wildland areas. For these reasons, risks from exposure to wildland fires would be less than significant.

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. Action 2.1 could result in the development of larger renewable energy systems (such as large-scale solar PV systems or biomass systems). Though facilities such as this could be located outside of existing urbanized areas, it is expected that they would be sited in industrial areas and near existing utility infrastructure within City limits, and therefore would not contribute to an increased risk of exposing people or structures to loss, injury, or death involving wildland fires, and the impact would be less than significant.

Outside of the City limits, development of large-scale renewable energy facilities may occur on private or public lands. Such developments could be developed in proximity to rural, open space areas with exposure to wildland fires. In such cases, it would be the responsibility of the agency with land use authority over the project site to ensure that such developments do not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Therefore, conflicts either would not occur, or would be resolved by the local agency. In either case, it is anticipated that impacts associated with exposure to wildland fires would be identified and mitigated through the planning process for proposed facilities and would result in risks from exposure to wildland fires that are less than significant.

***Threshold: Would the Project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?***

Projects implementing CAP Actions could be located within one-quarter mile of a school. Implementation of the CAP would not change or alter the use of hazardous materials associated with these projects and would not increase the risk from hazardous materials. Construction activities associated with implementation of the CAP, for example, residential and commercial retrofits, intersection modifications, or facility improvements, could require temporary use of construction materials such as paints and solvents. To the extent that construction of future projects implementing the CAP would result in projects transporting or using hazardous materials, those projects would be required to comply with applicable federal, state, and local regulations related to hazardous materials, such as those administered by the U.S. Environmental Protection Agency; U.S. Department of Transportation; and County of San Diego Department of Environmental Health, Hazardous Materials Division.

Implementation of the CAP is not expected to increase exposure of the population to hazardous waste, and required compliance with federal and state regulations pertaining to hazardous wastes would minimize risks associated with hazardous emissions, and impacts regarding the handling or discovery of hazardous materials, substances, or waste within close proximity to a school would be less than significant.

***Threshold: Would the Project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?***

The ongoing implementation and updating of the City of San Diego's Emergency Operations Plan allows for adequate response to emergencies as growth occurs, and reduces the potential for interference with emergency plans. Strategies and activities included in the CAP would not result in effects, such as an increase in traffic volumes that could impair implementation of an emergency response plan or emergency evacuation plan. Action 3.4 of the CAP entails implementation of a Traffic Signal Master Plan to retime traffic signals to reduce vehicle fuel consumption. It is anticipated that any traffic signal retiming would be incorporated within and comply with updates to the City's Emergency Operations Plan, and therefore would not interfere with an adopted emergency response plan or emergency evacuation plan.

Improvements to transportation infrastructure related to implementation of the CAP, such as modification of an intersection to install a roundabout, would be required to comply with City construction requirements. An approved Traffic Control Plan would be implemented during construction of any future project implementing the CAP which would allow emergency plans to operate. Therefore, implementation of the CAP would not physically interfere with an adopted emergency response plan or emergency evacuation plan, and the impact would be less than significant.

***Threshold: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or environment?***

Implementation of CAP strategies and actions as a component of future projects would not change or alter the potential for location on a hazardous materials site, and would not be expected to increase risk of exposure to hazardous materials. If implementation of the CAP Actions as a component of a specific project is proposed on a hazardous materials site, remediation and cleanup to the appropriate standard would be required to comply with existing federal, state and local hazardous materials policies and regulations. For these reasons, the impact to the public or environment from location on a hazardous material site is less than significant.

***Threshold: Would the Project expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses?***

Implementation of the CAP as a component of a specific project would not change or alter the potential for exposure of the population to hazardous toxic substances such as pesticides and herbicides. Required compliance with federal, state and local regulations pertaining to hazardous wastes would minimize any risks, and therefore impacts regarding the risk of exposure to these toxic substances would be less than significant.

***Threshold: Would the Project result in a safety hazard for people residing or working in a designated airport influence area?***

The San Diego International Airport, Marine Corps Air Station Miramar, Brown Field Municipal Airport, and Montgomery Field Municipal Airport are located within the City. The Tijuana International Airport, Gillespie Field, Naval Air Station North Island, and Naval Outlying Field Imperial Beach are located adjacent to the City, but have the potential to affect land use and people within the City. To prevent incompatible uses in areas of higher aircraft hazard potential, the Airport Land Use Commission (ALUC), in compliance with State law, has prepared Airport Land Use Compatibility Plans (ALUCPs) for areas surrounding each airport with land use policies and criteria in the interest of public safety.

Implementation of CAP Actions as a component of future projects would not change or alter their compatibility with or proximity to a public airport. Any project proposed near an airport facility would be required to be compatible with the applicable ACLUP, and any applicable Federal Aviation Administration (FAA) regulations. For these reasons, implementation of CAP Actions would not introduce any new features that would result in a safety hazard for people residing in or working in a designated airport influence area, and impacts related to this risk would be less than significant.

***Threshold: Would the Project result in a safety hazard for people residing or working within two miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted Airport Land Use Compatibility Plan?***

Implementation of CAP Actions as a component of future projects would not change or alter their compatibility with or proximity to a private airstrip, airport or heliport facility. Any project

proposed near such a facility would be required to be compatible with applicable Federal Aviation Administration (FAA) regulations. For these reasons, implementation of CAP Actions would not introduce any new features that would result in a safety hazard for people residing or living within two miles of a private airstrip or a private airport or heliport facility that is not covered by an adopted ALUCP, and impacts related to this risk would be less than significant.

## Hydrology and Water Quality

The CAP includes Actions which promote the use of clean and renewable energy through encouraging use of mass transit, walking and bicycling by creating new and extended mass transit infrastructure and services, renovations, retrofits of existing sidewalks, cross-walks, pedestrian trails, and new bike lanes and facilities (Actions 3.1 through 3.6). The CAP also includes strategies to divert solid waste and capture methane from wastewater treatment facilities (Action 4.1 and 4.2). These actions would result in the construction of new or an expansion of existing waste processing and wastewater treatment facilities. These CAP Actions could result in both short-term construction and long-term operational impacts that could potentially affect hydrology and water quality resources. Water resources are protected by numerous federal, state and local jurisdictional laws, regulations, plans and ordinances. Compliance with water quality regulations and standards within the City of San Diego is achieved through conditions of required permits. Adherence to the City's Stormwater Standards Manual is considered to result less-than-significant impacts to hydrology and water quality. Projects that implement the CAP Actions would be subject to the required permits and adherence to the City's Stormwater Standards; therefore, implementation of the CAP would not be expected to violate applicable water quality regulations and standards.

Implementation of the CAP Actions described above would be subject to the City's Storm Water Standards Manual or later iteration of that document; however, projects that implement the CAP Actions would primarily take place in urban and developed areas and would not generally require new areas of ground disturbance. In some cases new infrastructure may be necessary, for example, for gas capture improvements at landfills or wastewater treatment plants (Action 4.2 Implement operational procedures to capture methane gas from wastewater treatment). It is anticipated that new infrastructure associated with implementation of Action 4.2, such as footings or a pipeline, would be located within the existing disturbed footprint of the facility and therefore would not generally require new ground disturbance.

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, it could encourage the development of larger renewable energy systems (such as large-scale solar PV systems or biomass systems). Facilities such as this could be located outside of existing urbanized areas, but it is expected that they would be located in industrial areas and near existing utility infrastructure within the City's limits. These facilities would also be subject to the City's existing water quality regulations and standards, and therefore, the impacts to hydrology and water quality would be less than significant.

Development of these renewable facilities occurring outside the City's limits would be subject to review and approval by the agency with land use authority over the project site. The local jurisdiction would ensure that such developments are compatible with local, state and federal water quality regulations and standards. It is anticipated that any impacts on water quality resources would be identified and mitigated through the planning process for proposed facilities, and therefore, the impacts to hydrology and water quality would be less than significant.

Depending on the area of disturbance, implementation of certain measures or strategies in the CAP, such as the installation of bicycle amenities and facilities (Action 3.3 Implement the City of San Diego's Bicycle Master Plan to increase commuter bicycle opportunities), gas capture improvements at landfills or wastewater treatment plants (Action 4.1 Present to City Council for consideration a Zero Waste, and development of large scale renewable facilities would have to comply with either a Water Pollution Control Plan (WPCP) or Storm Water Pollution Prevention Plan (SWPPP). These plans would prevent or effectively minimize short-term water-quality impacts during construction activities. Additionally, projects that implement the CAP Actions would be subject to all Regional Water Quality Control Board regulations related to water quality protection. Therefore, implementation of the CAP would not violate existing water quality standards or discharge requirements, and a less-than-significant impact would result.

***Threshold: Would the Project result in a substantial increase in impervious surfaces and associated increased runoff?***

Implementation of CAP Actions is not likely to result in a substantial increase in impervious surfaces, because they would primarily take place in urban and developed areas. In fact, CAP Action 1.5 entails implementation of an Outdoor Landscaping Ordinance that requires use of weather-based irrigation controllers, which would have the positive effect of reducing runoff on existing impervious surfaces.

Implementation of the CAP would involve modification of transportation facilities (Action 3.5 Implement a Roundabouts Master Plan to install roundabouts to reduce vehicle fuel consumption) and expansion of infrastructure supporting alternative modes of transportation like bicycles (Action 3.3 Implement the City of San Diego's Bicycle Master Plan to increase commuter bicycle opportunities). The CAP also supports implementation of City plans and policies that are intended to achieve better walkability (Action 3.2 Implement the City of San Diego's Pedestrian Master Plan in Transit Priority Areas to increase commuter walking opportunities) and transit-supportive densities (Action 3.6 Implement transit-oriented development within Transit Priority Areas). The resulting intensification within selected urbanized areas is expected to reduce development pressures on vacant and undeveloped land and so would not contribute to an increase in impervious surfaces and associated increased runoff. It is anticipated that new infrastructure associated with implementation of CAP Actions, such as the modification of an existing intersection to install a roundabout, would be located primarily within the existing footprint of the facility and would not generally result in a substantial increase in impervious surfaces and associated runoff, therefore a less than significant impact would occur.



***Threshold: Would the Project result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?***

Implementation of CAP Actions would require minimal, if any, new areas of disturbance. Therefore, existing drainage patterns of a site would not be altered, nor would the amount of surface runoff be increased such that it would cause flooding. Implementation of CAP Actions as a component of future projects would not change or alter a future project's effect on drainage patterns. Therefore, implementation of the CAP would not substantially alter existing drainage patterns or increase amounts of surface runoff that could result in flooding, and a less-than-significant impact would occur.

## Mineral Resources

***Threshold: Would the Project result in the loss of availability of a significant mineral resource (e.g. sand or gravel) as identified the Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production – Consumption Region, 1996, Department of Conservation, California Department of Geological Survey (located in the EAS library)?***

The location of San Diego's high-quality mineral resource areas are designated within the General Plan as Mineral Resource Zone (MRZ)-2 areas. These are areas designated for the managed production of mineral resources. State law requires cities to plan for the beneficial management of these valuable mineral resources. Impacts on mineral resources occur when access to the resource is restricted or prohibited through development of lands containing the resource or when non-compatible land uses are developed in close proximity, thereby reducing the likelihood for extraction of those resources. Implementation of the CAP would not create new or modified land uses that would be incompatible with mineral access, as most CAP-related Actions would include modifications or improvements to existing structures or facilities. The CAP Actions are consistent with the General Plan and associated policies and plans, including those related to mineral resources in the Conservation Element. For these reasons, adoption of the CAP would not result in the loss of availability of a known mineral resource of value to the region and the state, and a less-than-significant impact would occur.

## Noise

***Threshold: Would the Project result or create a significant increase in the existing ambient noise levels?***

Implementation of the CAP Actions would include retrofitting existing structures for energy efficiency, modification of transportation facilities such as re-timing traffic signals or installing roundabouts, and expansion of electric vehicle charging infrastructure and bicycle commuter amenities. These CAP components would typically not produce a new source of noise resulting in a permanent increase over ambient noise levels. However CAP Action 3.1, which entails implementation of the General Plan's Mobility Element and the City of Villages Strategy in Transit Priority Areas (TPAs) to increase the use of transit, could result in additional noise due to an increase in transit vehicles like buses in TPAs. The CAP has been prepared to be consistent with the

City's General Plan, and because the City of Villages Strategy is part of the General Plan, the impacts associated with planned transit improvements have been analyzed in the General Plan EIR. Therefore, Action 3.1 of the CAP will implement projects already included in the General Plan and the General Plan EIR, so no additional noise impacts are expected as a result of the CAP.

Implementation of the CAP Actions as a component of a specific project, or due to installation of new infrastructure such as intersection modifications, could result in temporary construction noise. The City of San Diego typically regulates noise associated with construction equipment and activities through enforcement of noise ordinance standards, implementation of General Plan policies, and imposition of conditions of approval for building or grading permits, so temporary noise impacts would be minimized.

Implementation of the CAP would be subject to existing City noise policies and regulations, and General Plan policies and programs, specifically those found in the Noise Element. Therefore, implementation of most actions included in the CAP would not create a permanent increase in ambient noise levels, and the impact would be less than significant. Action 3.1 could create a permanent increase in noise levels due to additional transit vehicles in TPAs, but these improvements are included in the General Plan City of Villages Strategy, and the impacts have been analyzed in the General Plan EIR.

CAP Action 2.1 could encourage the development of larger renewable energy systems (such as large-scale solar PV systems or biomass systems), within or outside the City's limits. Adherence to City noise policies and regulations during construction and operation of the facilities would serve to mitigate noise-related impacts. Development of these renewable facilities occurring outside the City's limits would be subject to review and approval by the agency with land use authority over the project site. The local jurisdiction would ensure that such developments adhere to local noise regulations and standards during construction and operation of the facilities. It is anticipated that any noise impacts would be identified and mitigated through the planning process for proposed facilities.

***Threshold: Would the Project expose people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table K-4?***

As stated above, implementation of the CAP as a component of a specific project would typically not produce a new permanent source of noise, and construction-related noise would be regulated through enforcement of applicable City noise policies, regulations and permits. As a result, implementation of the CAP would not expose people to noise levels which exceed the City's adopted noise ordinance or are incompatible with Table K-4, and the impact would be less than significant.

***Threshold: Would the Project expose people to current or future transportation noise levels which exceed standards established in the Transportation Element of the General Plan or an adopted airport Comprehensive Land Use Plan?***

Implementation of the CAP strategies and actions include a number of transportation-related improvements, including modification of transportation facilities such as re-timing traffic signals

or installing roundabouts, expansion of bicycle commuter amenities. The CAP also supports implementation of existing City plans and policies such as the Bicycle Master Plan, Pedestrian Master Plan, and goals and policies of the City's General Plan to achieve better walkability and transit-supportive densities. In general, because they support mass transit and switching from vehicles to active transportation (such as bicycles and walking), the transportation-related strategies and actions in the CAP would contribute to a reduction in future transportation noise levels, and a less-than-significant impact would occur.

***Threshold: Would the Project result in land uses which are not compatible with aircraft noise levels as defined by an adopted airport Comprehensive Land Use Plan (CLUP)?***

Permanent noise increases are not anticipated with implementation of the CAP, and only minor temporary increases would occur with project-specific construction activities that would be regulated by City codes and policies. If project work were to occur within an airport land use plan area or within two miles of a public airport, and if construction workers were to be exposed to airport noise, compliance with Occupational Safety and Health Administration (OSHA) standards for worker safety would minimize exposure to excessive noise levels. For these reasons, implementation of the CAP would be compatible with aircraft noise levels as defined by an adopted airport Comprehensive Land Use Plan, and any impact would be less than significant.

## Paleontological Resources

***Threshold: Would the Project require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit?***

Implementation of the CAP Actions under CAP Strategy 1 (Water and Energy Efficient Buildings), Strategy 3 (Bicycling, Walking, Transit and Land Use), Strategy 4 (Zero Waste), and Strategy 5 (Climate Resiliency) would primarily include projects located in urban and developed areas, and would not generally require new ground disturbance that could impact a high or moderate resource potential geologic deposit. While some ground disturbing activity may result from work on existing structures during an energy efficiency retrofit, or installation of new infrastructure for gas capture improvements at landfills or wastewater treatment plants, it is anticipated that it would be located entirely within the existing disturbed footprint of the facility with no new areas of disturbance. Because no new areas of substantial ground disturbance are anticipated with implementation of these CAP Actions, implementation of the CAP is not expected to require over 1,000 cubic yards of excavation in a high resource potential geologic deposit, formation or rock unit, and the impact on paleontological resources or unique geologic features would be less than significant.

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, it could encourage the development of larger renewable energy systems (such as large-scale solar PV systems or biomass systems) within and outside the City's limits. Development of these renewable facilities occurring outside the City's limits would be subject to review and approval by the agency with land use authority over the project site. It is anticipated that impacts to paleontological resources

that may occur during construction of facilities located within a high or moderate resource potential geologic deposit would be identified and mitigated through the planning process for proposed facilities.

***Threshold: Would the Project require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?***

As stated above, it is not anticipated that substantial ground disturbance would result from implementation of most CAP actions. For the same reasons stated above, implementation of the CAP is not expected to require over 2,000 cubic yards of excavation in a medium resource potential geologic deposit, formation or rock unit, and the impact on paleontological resources or unique geologic features would be less than significant.

## Public Services and Facilities

***Threshold: Would the Project have an effect upon, or result in a need for new or altered governmental services in any of the following areas:***

***Police protection***

***Parks or other recreational facilities***

***Fire/Life Safety protection***

***Maintenance of public facilities, including roads***

***Libraries***

***Schools***

Implementation of the CAP could include modification of existing City structures and facilities, improvements to intersection operations, an increase in use of mass transit options, and implementation of other similar energy-saving actions. These CAP-related project components would not generate new or increased demand for fire protection services, or interfere with or modify the ability of fire protection services to meet performance objectives or response times outlined in the General Plan. As a result, implementation of CAP strategies and actions as part of a new project would not change or alter the fire protection requirements associated with that project, and no impact would occur. For the same reasons, implementation of the CAP would not result in the need for new or expanded police protection facilities that could result in an environmental effect, and no impact would occur.

The CAP does not contain any strategies or actions that would increase school enrollment. Implementation of the CAP could modify school facilities to make them more energy efficient, but these retrofit projects would not change the capacity of schools or increase the enrollment. Implementation of CAP strategies and actions as a component of future projects would not change or alter the school enrollment demands associated with that project. For these reasons, implementation of the CAP would not result in the need for new or expanded school facilities that could result in environmental effects, and no impact would occur.

Implementation of the CAP as a component of a specific project would not change or alter the demand for park or recreation facilities. For this reason, adoption and implementation of the CAP would not result in the need for new or expanded park facilities that could result in environmental effects, and no impact would occur.

Implementation of the CAP would not increase the demand for libraries or other services to the extent that new facilities would be required, and would not result in an accelerated deterioration of facilities or need for new facilities. Implementation of CAP strategies and actions could result in public facilities modifications to make them more energy efficient, but these retrofit actions would not interfere with operation of public facilities or increase the use or deterioration of the facility. Implementation of the CAP as a component of a specific project would not change or alter the demand for public facilities associated with that project. For these reasons, implementation of the CAP would not result in the need for new or altered maintenance of public facilities, including roads, which could result in environmental effects, and no impact would occur.

## B. Significant Unavoidable Impacts

Public Resources Code Section 21100(b) (2) and CEQA *Guidelines* Section 15126.2(b) require that any significant and unavoidable effect on the environment must be identified in an EIR. In addition, CEQA *Guidelines* Section 15093(a) allows the decision-making agency to determine if the benefits of a project outweigh the unavoidable adverse environmental impacts of implementing the project. The City can approve a project with unavoidable adverse impacts if it prepares and adopts a “Statement of Overriding Considerations” setting forth the specific reasons for making such a judgment.

The Project, if implemented, could result in significant adverse environmental impacts, as discussed in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures. 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. 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.

## C. Significant Irreversible Environmental Changes

Public Resources Code Section 21100(b)(2) requires that an EIR include a discussion of significant irreversible environmental changes that would result from implementation of a project. CEQA *Guidelines* Section 15126.2(c) describes irreversible environmental changes as follows:

*Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.*

In addition, Public Resources Code Section 21100(b)(3) requires that lead agencies consider “measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.” Appendix F of the CEQA *Guidelines* further states, “Potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project.”

As discussed in Section 3.A Land Use, the CAP does not propose any changes to land use or zoning designations that would alter the population or job growth anticipated in the City’s General Plan such that there would be additional growth. The CAP quantifies the GHG reduction potential of Actions that implement the General Plan City of Villages strategy, and SANDAG Sustainable Communities Strategy (SCS), which both direct growth into compact, mixed-use, walkable centers linked by transit, thereby reducing vehicular travel. By reducing vehicle use and encouraging the use of alternative transportation modes, the CAP would reduce dependency on fossil fuels and associated GHG emissions.

The CAP encourages the construction of small- and large-scale renewable energy generation systems, which would require the use of energy and building materials during construction, but would result in a long-term reduction in energy consumption from the business-as-usual (BAU) scenario and a reduction in the use of nonrenewable energy sources. Operation and maintenance of the facilities may require the use of natural gas, electricity, and water resources; however, such use would be insignificant compared to the overall reduction in use of these resources that would result from CAP implementation. The CAP does not propose any development that would otherwise entail a significant use of energy resources.

Furthermore, a primary goal of the CAP is to reduce energy consumption throughout the City by increasing residential and municipal energy efficiency in existing buildings and reducing water consumption, which would reduce the City’s overall energy consumption. At the same time, the CAP anticipates that the City will supply the majority (up to 94 percent) of its energy needs with renewable energy sources, and would thereby eliminate the use of most nonrenewable energy sources by 2035. The CAP would not result in the inefficient, wasteful, and unnecessary consumption of energy or other resources, and therefore, no significant irreversible environmental changes would occur.

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# CHAPTER 8

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## Alternatives

The purpose of this chapter is to describe and evaluate a reasonable range of alternatives to the proposed Project in order to inform the public and decision makers regarding the comparative merits of alternatives that might avoid or substantially lessen any of the Project’s significant environmental effects.

### A. CEQA Requirements

The California Environmental Quality Act (CEQA) requires that an EIR describe and evaluate a range of reasonable alternatives to the proposed project, or to the location of the proposed project, and evaluate the comparative merits of the alternatives (CEQA *Guidelines* Section 15126.6(a),(d)). The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those alternatives necessary to permit informed public participation and an informed and reasoned choice by the decision-making body (Section 15126.6(a),(f)).

The range of alternatives shall include alternatives that would feasibly attain most of the basic objectives of the project and would avoid or substantially lessen any of the significant effects of the project (Section 15126.6(a)-(c)). CEQA generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors. In addition, the following may be taken into consideration when assessing the feasibility of alternatives: site suitability; economic viability; availability of infrastructure; general plan consistency; other plans or regulatory limitations; jurisdictional boundaries; and the ability of the proponent to attain site control (Section 15126.6(f)(1)). If the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR (Section 15126.6(f)(2)(B)).

The description or evaluation of alternatives does not need to be exhaustive, and an EIR need not consider alternatives for which the effects cannot be reasonably determined and for which implementation is remote or speculative. An EIR need not describe or evaluate the environmental effects of alternatives in the same level of detail as the proposed project, but must include enough information to allow meaningful evaluation, analysis, and comparison with the proposed project (CEQA *Guidelines* Section 15126.6(d)).

The “No Project” alternative must be evaluated. This analysis shall discuss the existing conditions, as well as what could be reasonably expected to occur in the foreseeable future if the



project were not approved, based on current plans and consistent with available infrastructure and community services (Section 15126.6(e)(2)).

CEQA also requires that an environmentally superior alternative be selected from among the alternatives. The environmentally superior alternative is the alternative with the fewest or least severe adverse environmental impacts. When the “no project” alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative from among the other alternatives (Section 15126.6(e)(2)).

## **B. Factors in the Selection and Rejection of Alternatives**

The CEQA *Guidelines* provide that an EIR should briefly describe the rationale for selecting the alternatives to be discussed, identify any alternatives that were considered by the lead agency but were rejected as infeasible, and briefly explain the reasons underlying the lead agency’s determination (CEQA *Guidelines* Section 15126.6(c)). The following factors were considered in identifying the reasonable range of alternatives analyzed in this PEIR:

- the extent to which the alternative would accomplish most of the basic goals and objectives of the proposed Project (shown in Chapter 2, Project Description);
- the extent to which the alternative would avoid or lessen any of the identified significant effects of the proposed Project;
- the feasibility of the alternative, taking into account suitability, economic viability, availability of infrastructure, and consistency with other applicable plans and regulatory limitations;
- the appropriateness of the alternative in contributing to a “reasonable range” of alternatives necessary to permit a reasoned choice; and
- the requirement of the CEQA *Guidelines* to consider a “No Project” alternative and to identify an “environmentally superior” alternative in addition to the No Project Alternative (Section 15126.6(e)).

## **C. Alternatives Eliminated from Consideration**

CEQA *Guidelines* Section 15126.6(c) requires an EIR to identify and briefly discuss any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process. In identifying alternatives, primary consideration was given to alternatives that would reduce significant impacts while still meeting most of the Project objectives.

As the City of San Diego Climate Action Plan (CAP) is specifically intended to reduce greenhouse gas (GHG) emissions within the City, an alternative site would not be appropriate as an alternative to the proposed Project. Therefore, any off-site alternatives were rejected from further analysis in this PEIR because they do not meet the objectives, nor do they fulfill legal requirements under State law.

Because the CAP is intended to implement and supplement policies in the City of San Diego General Plan (2008) regarding GHG reduction and sustainability and not replace them, no alternative is considered that would alter General Plan policies regarding land use, including the City of Villages development strategy and the Mobility element.

The **Enhanced Sustainability Alternative** was analyzed in the Final Program Environmental Impact Report for the City's 2008 General Plan update (General Plan PEIR) as an alternative that would reduce the environmental effects of the General Plan related to energy and water consumption, solid waste generation, water quality and air quality. As described in the General Plan PEIR, this alternative would likely take several years to develop, including adoption of new or amended regulations and programs to implement the mandatory policies. Specifically, the Enhanced Sustainability Alternative would add mandatory policies to the General Plan to enhance the sustainability of future development within the plan area. Likely policies would include requirements for: builders/owners to employ sustainable building techniques (e.g., energy efficient design; landscaped "green" roofs; recycled building materials; renewable energy generation [e.g., solar panels]) in private developments; the installation of recycled water systems for large development projects; and reductions in water consumption associated with existing and future development in the plan area (e.g., landscaping associated with residential land uses, landscaping and fields within parks and open spaces, etc.).

The Enhanced Sustainability Alternative from the General Plan PEIR is similar to the CAP, as it would add the General Plan policies aimed at achieving more sustainable development. The Enhanced Sustainability Alternative was identified as the environmentally superior alternative in the General Plan PEIR. However, the City, by undertaking the CAP, has taken actions to reduce GHG emissions in an approach that incorporates the principals and environmental objectives of the Enhanced Sustainability Alternative. Since the Enhanced Sustainability Alternative does not differ substantially from the Project as proposed (i.e., the CAP), it would not add to the range of alternatives considered, and therefore is excluded from further analysis.

An **Environmental Justice Alternative** would gear CAP actions to environmental justice communities, including low income communities and communities of color. This alternative would emphasize: development of affordable housing within transit priority areas (TPAs); development of transit and other alternative transportation modes specifically to serve environmental justice communities; implementing CAP actions, such as energy and water conservation and tree planting, in environmental justice communities; and clear preference for siting facilities, including renewable energy facilities that emit air pollutants (such as biomass and other combustion facilities), and waste processing facilities in locations where they would not adversely affect environmental justice communities.

This alternative was rejected from further consideration because some actions are not under the jurisdiction of the City (development of transit and other alternative transportation modes specifically to service environmental justice communities), some actions are already incorporated into the General Plan, especially the Housing Element, (development of affordable housing within Transit Priority Areas), and some actions are already incorporated into the CAP (energy and water

conservation and tree planting would be citywide, and thus, in environmental justice communities). In addition, an Environmental Justice Alternative would not reduce any of the significant impacts to Visual Effects and Neighborhood Character, Air Quality, Historical Resources, or Transportation and Circulation. Therefore, this alternative's actions are not substantially different from the CAP, and thus, this alternative was rejected from further consideration.

## D. Description of Alternatives Selected for Analysis

According to the CEQA *Guidelines*, the range of alternatives required is governed by the “rule of reason” that requires the PEIR to set forth only those feasible alternatives necessary to permit an informed and reasoned choice by the decision-making body and informed public participation. There are many potential CAP alternatives that could be considered for implementation by the City. Analysis of every possible alternative is infeasible and would be redundant. Furthermore, CEQA does not require that every alternative be considered. This section describes the reasonable range of alternatives that were developed by the City during the planning process for the PEIR. The following alternatives to the proposed Project were selected to be addressed in this PEIR:

- **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 CAP.
- **The CMAP Alternative** is based on the City of San Diego's earlier efforts to develop a climate action plan, called the Climate Mitigation and Adaptation Plan (CMAP). The CMAP was drafted in 2012, but never adopted. This alternative consists of a somewhat different set of strategies and actions than the CAP.

### No Project Alternative

Section 15126.6(e) of the CEQA *Guidelines* requires that an EIR evaluate and analyze the environmental impacts of the “No Project” Alternative, to examine and compare the potential environmental consequences associated with disapproving the Project. In this case, the No Project Alternative examines the scenario that would occur if the CAP is not adopted and implemented by the City. Under this scenario, the General Plan policies and programs would still be in effect, including the City of Villages development strategy and Mobility Element.

While the General Plan includes several policies related to climate change, it lacks the specificity of program development contained in the CAP. Under the No Project Alternative, strategies and actions that implement those policies would not be put into place. Actions aimed at facilitating and encouraging implementation of the City of Villages strategy, including Actions 3.1 and 3.6, would not occur. Therefore, it is likely that implementation of the City of Villages strategy and concentration of future development within TPAs may be slowed. There would not be development of a community choice aggregation program or similar program, so there would be less incentive for development of small scale and large scale renewable energy facilities, and a slower shift to renewable energy sources. Other actions that would increase building energy efficiency and water use would not be implemented, and efforts to reduce waste and increase recovery of methane from waste treatment would be less intensive and less coordinated.

Implementation of the Bicycle Master Plan and Pedestrian Master Plan, as well as the Urban Forestry Plan and the Recycled Water Master Plan, all of which have already been adopted by the City, would still occur. Other CAP actions, such as 3.4 Implement a Traffic Signal Master Plan and 3.5 Implement a Roundabouts Master Plan, would not occur. Overall, the No Project Alternative would result in fewer actions and measures to reduce GHG emissions, and less coordinated and presumably less effective implementation of the General Plan's goals and policies to address climate change.

Without the CAP, it is questionable whether the City would achieve its GHG reduction target of 49 percent below 2010 levels by the Year 2035. Under the No Project Alternative the City would still realize GHG emissions reductions from several high-impact state-wide measures included in the AB 32 Scoping Plan, but the gap in emissions reduction potential intended to be filled by the CAP would likely still exist.

## CMAP Alternative

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; however, the CMAP did not contain specific implementing actions and corresponding reductions for meeting the post-2020 reduction goals. Also, due to the less-recently updated nature of the CMAP, it would not serve as a qualified GHG reduction plan under CEQA Guidelines Section 15183.5. that would account for emissions post-2020. ~~and~~ The CMAP Alternative 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:

1. The Energy strategy aims to reduce GHG emissions by improving the energy efficiency of both new and existing residential and commercial buildings, increasing the use of distributed renewable and efficient energy production, and improving community wide understanding of energy management.
2. 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.

3. The Land Use and Local Food System strategy would reduce emissions by supporting the City's General Plan, resulting in more compact, walkable, transit-accessible neighborhoods and by strengthening the regional food system, including expanding urban agricultural activities.
4. The Waste strategy would reduce emissions by diverting waste from landfills, and by supporting continual improvement in equipment and operation for wastewater treatment and landfill management.

As stated in the 2012 Draft CMAP, GHG reductions from actions undertaken pursuant to the plan would be 1.6 million metric tons (MT) of CO<sub>2</sub>e by 2020, and 3.3 million MT by 2035.

## E. Project Objectives

As stated in the first factor bulleted under 8.B above, the selection of alternatives must consider the basic goals and objectives of the Project. As previously presented in Chapter 2, Project Description, the Project objectives for the CAP include:

- Provide a roadmap to achieve GHG reductions;
- Conform to California laws and regulations;
- Implement the General Plan;
- Provide CEQA tiering for new development's GHG emissions;
- Create green jobs through incentive-based policies, such as the manufacturing 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.

The ability of the Project and the two Alternatives to meet these objectives is discussed further, below.

## F. Environmental Assessment

This section presents an environmental assessment of each alternative relative to the proposed Project, by environmental topic. As permitted by CEQA, the significant environmental effects of the alternatives are discussed in less detail than are the effects of the proposed Project (CEQA *Guidelines* Section 15126.6(d)). However, the analysis is conducted at a sufficient level of detail to provide the public and decision-makers with adequate information to fully evaluate the alternatives and to approve any of the alternatives without further environmental review.

## Visual Effects and Neighborhood Character

As discussed in Section 3.B, the CAP as proposed could result in impacts to visual resources, but these would be mitigated to less than significant with specified mitigation measures. Significant visual impacts were identified for CAP Action 2.1 Community Choice Aggregation Program, since it could result in the development of large-scale renewable energy facilities within the City, which could be out of character with the surrounding neighborhood, or could adversely affect scenic views. The No Project Alternative does not include CAP Action 2.1, and so it would avoid this impact. The CMAP alternative does not anticipate development of large-scale renewable energy facilities, and so would also avoid this impact.

The General Plan PEIR identified as significant and unavoidable the potential for visual quality and neighborhood character conflicts associated with implementation of the City of Villages strategy. This impact would remain significant and unavoidable for the Project, as well as for the No Project Alternative and the CMAP Alternative, both of which would also implement the City of Villages strategy.

## Air Quality

Section 3.C, Air Quality, states that the General Plan PEIR identifies potentially significant and unavoidable air quality impacts from emissions of particulate matter from construction activities and concentrated CO “hot spots” associated with implementation of the City of Villages strategy, and states that this impact would remain significant and unavoidable for the CAP. The same impact would potentially occur with each of the two alternatives, both of which would also implement the City of Villages strategy.

Section 3.C also identifies a potentially significant and unavoidable air quality impact from development of large-scale renewable energy, solid waste, water, and wastewater facilities. Because the No Project Alternative would not result in the development projects of this kind, it would not have associated impacts. The CMAP Alternative does not anticipate construction of large-scale renewable energy facilities within the City, and so would avoid project impacts associated with the development and operation of such facilities. The CMAP contains an aggressive waste reduction strategy, and so would likely have similar impacts related to increased solid waste collection and processing programs. The No Project Alternative does not include this action, and so would not have an impact of this kind.

## Biological Resources

The proposed CAP and the two alternatives would all concentrate future growth within the urbanized area, and all would be required to comply with existing regulations for protection of biological resources. Therefore, impacts on biological resources would be less than significant for both alternatives, as well as for the Project as proposed.

## Historical Resources

Section 3.E, Historical Resources, notes the potential for proposed CAP actions to impact historical resources, for example from building retrofits or installation of small-scale renewable energy systems, but states that adherence to existing regulations and policies intended to protect the integrity of these resources would avoid significant impacts. This would be true of both of the alternatives being examined, since the existing regulations and policies would be equally applicable and effective.

Section 3.E also notes that the General Plan PEIR identifies a significant and unavoidable impact from redevelopment that would occur from implementation of the City of Villages strategy, and that this impact would be carried over to the proposed CAP as well. The No Project Alternative and the CMAP Alternative would both also have the potential for this impact as well, since they both would maintain and implement the City of Villages strategy. Therefore, the Project as proposed and both alternatives would have the same impacts on historical resources.

## Paleontological Resources

Chapter 7, Other CEQA Considerations, examines the potential for the CAP to disturb paleontological resources, and concludes that while some proposed CAP actions may result in land disturbance, the extent of disturbance would generally be limited, and most disturbance would take place within already developed areas. Therefore, the impact on paleontological resources or unique geologic features would be less than significant.

The No Project Alternative would result in fewer actions involving construction and land disturbance, and so would have a somewhat lesser impact on paleontological resources. The CMAP Alternative does not anticipate development of large-scale renewable energy facilities, and so its impacts on these resources would be somewhat less than the Project as proposed.

## Mineral Resources

Chapter 7, Other CEQA Considerations, examines the potential for the CAP to impact mineral resources, including the potential to result in new or modified land uses that would lead to the loss of availability of a known mineral resource of value to the region and the state, and concludes that no such potential exists. Neither the No Project Alternative nor the CMAP Alternative would be associated with changed land uses, and so neither alternative would have the potential for an impact of this kind.

## Geology and Soils

Chapter 7, Other CEQA Considerations briefly discusses the potential for the proposed CAP to have an adverse impact related to geology and soils, and concludes that implementation of the CAP would not be expected to expose people or structures to potential substantial adverse effects involving earthquakes, mudslides, landslides, or other geologic hazards and therefore risks related to these hazards would be less than significant. Chapter 7 also concludes that existing regulations

would be sufficient to prevent significant erosion associated with construction that may take place pursuant to the CAP.

Both the No Project Alternative and the CMAP Alternative would involve redevelopment within the City with implementation of the City of Villages strategy, and this development would be subject to the same risks and the same regulatory protections. Therefore, both of the alternatives would have the same less than significant impacts as the Project with regard to geology and soils.

## Greenhouse Gases

Section 3.D, Greenhouse Gases, concludes that one proposed CAP Action, Action 4.1 Divert Solid Waste and Capture Landfill Emissions, could result in significantly increased GHG emissions, because it would increase VMT by solid waste collection and long-haul vehicles; however, implementation of the CAP as a whole, including CAP Action 2.3, Conversion of Waste Collection Vehicles to Alternative Fuel, would result in a net decrease of GHG emissions. ~~Application of the specified mitigation measure would reduce this impact to less than significant.~~

The No Project Alternative does not include Action 4.1, and so would avoid this impact. The CMAP Alternative would include similar waste reduction strategies, and may therefore have a similar impact. However, the No Project Alternative would not include the CAP strategies and actions intended to implement the climate change policies contained in the General Plan, and would therefore result in inconsistency or conflict with policies and programs to reduce GHGs and address climate change. The No Project Alternative would thus have a significant impact related to GHGs.

The CMAP Alternative would implement local programs that would achieve a projected reduction of about 1.6 MMT of CO<sub>2</sub>e below business as usual by 2020, and about 3.3 MMT by 2035. The Project as proposed is projected to achieve reductions of about 0.4 million MT of CO<sub>2</sub>e by 2020, 1.3 MMT CO<sub>2</sub>e by 2030, and about 2.5 3.5 MMT 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.

## Health and Safety and Hazardous Materials

Chapter 7, Other CEQA Considerations discusses the potential for the CAP to result in increased risk or exposure of persons to hazardous situations and materials, including urban fires, wildland fires, the handling or discovery of hazardous substances within close proximity to a school, interference with an adopted emergency response plan or emergency evacuation plan, location of a project on a hazardous material site, safety hazards for people residing in or working in a designated airport influence area or proximity to a private airstrip or heliport. Chapter 7 concludes that the CAP would not have any significant impacts related to these issues.

Neither the No Project Alternative nor the CMAP Alternative would include any provisions that would increase health and safety risks or hazardous materials risks.



## Hydrology and Water Quality

Chapter 7, Other CEQA Considerations includes a discussion of the potential for implementation of proposed CAP actions to adversely impact hydrology and water quality. The discussion focuses on the potential for construction projects to result in contaminated runoff entering waterways, and for new development to increase impervious surfaces and associated increased runoff or to substantially alter surface drainage patterns, and concludes that, with adherence to existing regulations, impacts would be less than significant. For the same reasons – that is, the limited area of disturbance or change and the effectiveness of existing regulations, both the No Project Alternative and the CMAP Alternative would also be expected to have less than significant impacts of this kind.

## Water Supply

Section 3.H, Water Supply, discusses the potential for implementation of proposed CAP actions to result in a significant increase in the demand for water, and concludes that the CAP would not substantially increase demand and would not affect the ability of the City of San Diego or the San Diego County Water Authority's ability to provide water. The impacts associated with implementation of the CAP strategies and actions are therefore less than significant.

The CAP includes several actions to increase efficiency of water use and decrease water demand. Since these actions would not be implemented under the No Project Alternative, that alternative would have somewhat greater impacts than the CAP with regard to water supply; however, the concentrated development associated with the City of Villages strategy would also likely result in decreased water demand, and the General Plan PEIR concludes that implementation of the General Plan would not result in a significant impact on water supply.

The CMAP Alternative would include similar water efficiency actions as the CAP, and would not include any actions that would increase water demand; this alternative, therefore, would have the same beneficial impact on water supply as the CAP.

## Land Use

As described in Section 3.A, Land Use, 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, including not conflicting with the environmental goals, objectives, or recommendations of the General Plan or affected community plans. However, 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. With implementation of Mitigation Measure LU-1, potentially significant land use conflicts from siting of large-scale renewable energy facilities would be avoided, and after mitigation, this impact would be less than significant.

Neither the No Project Alternative nor the CMAP Alternative includes actions that would promote development of large-scale renewable energy projects within the City, and therefore the ~~significant~~ land use impact associated with the CAP would be avoided with both of these alternatives.

## Noise

Chapter 7, Other CEQA Considerations, examines the potential for the CAP to result in significant noise impacts and concludes that, while implementation of the CAP actions could result in temporary construction noise, City noise regulations, enforcement of noise ordinance standards, implementation of General Plan policies, and imposition of conditions of approval for building or grading permits would minimize temporary construction noise impacts and render such impacts less than significant. Implementation of the City of Villages strategy, as facilitated by the CAP, could result in permanent increases in noise levels in some TPAs, due to more concentrated development and greater use of transit buses and trains. General Plan policies would generally avoid significant impacts, however.

For the same reasons – that is, the limited extent of construction projects and the effectiveness of existing regulations, both the No Project Alternative and the CMAP Alternative would also be expected to have less than significant impacts of this kind.

## Public Services and Facilities

Chapter 7, Other CEQA Considerations examines whether the CAP would have an adverse effect upon, or result in a need for new or altered governmental services including police protection, parks and recreational facilities, fire/life safety protection, maintenance of public facilities, libraries, and schools. The discussion concludes that, because the CAP would not result in development or population growth beyond that anticipated and planned for in the General Plan, it would not have an impact on public services or facilities. For the same reason, both the No Project Alternative and the CMAP Alternative would have the same less than significant impacts.

## Utilities

As described in Section 3.G, most of the proposed CAP actions would not result in a need for new utility systems, or require substantial alterations to existing infrastructure. However, the development of large-scale renewable energy facilities within the City limits, which may result from implementation of CAP Action 2.1; the implementation of the City of Villages strategy, which would be facilitated by implementation of CAP Actions 3.1 and 3.6; and the development of new or expanded waste diversion and gas capture/use facilities which may result with implementation of CAP Actions 4.1 and 4.2, could result in such effects. This could result in a significant impact to public utilities. The potential for implementation of the City of Villages strategy to cause significant impacts on public utilities as identified in the General Plan PEIR, would remain significant and unavoidable. However, because 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 strategy are not considered impacts of the CAP. Other utility-related impacts are found to be less than significant.

For the same reason, both the No Project Alternative and the CMAP Alternative would have the same less than significant ~~and unavoidable~~ impacts.

## Transportation and Circulation

Section 3.F, Transportation and Circulation, concludes that, while proposed CAP actions including Action 3.4 Implement a Traffic Signal Master Plan and Action 3.5 Implement a Roundabouts Master Plan would improve traffic flow, the conclusion reached in the General Plan PEIR regarding the potential for significant unavoidable traffic impacts associated with implementation of the City of Villages strategy would remain. The No Project Alternative would not include Actions 3.4 and 3.5, so this impact would likely be more severe. The CMAP Alternative also includes actions to install roundabouts and time traffic lights, similar to the CAP.

## Agricultural Resources

Chapter 7, Other CEQA Considerations, examines the potential for implementation of the CAP to result in significant impacts on agricultural resources. The discussion notes that most of the CAP strategies and actions include activities that would take place in urban and developed areas of the City, and as a result, these actions would not result in the conversion of farmland or conflict with existing zoning for agricultural use, or Williamson Act contract. Action 2.1 of the CAP could, however, encourage or facilitate the development of larger renewable energy systems including large-scale solar renewable energy facilities within or outside the City limits. It is anticipated that such facilities would be located in industrial areas, industrial brownfields, and near existing utility infrastructure. This would include areas designated in the General Plan for industrial uses, institutional, public, and semi-public facilities. Any such development outside of the City would be subject to local land use regulations and planning process, and additional environmental review. Therefore, impacts on agricultural resources would not be expected.

The No Project Alternative would not implement Action 2.1, and so would not encourage development of large-scale renewable energy facilities within or outside the City, thus avoiding the potential for effects on agricultural resources identified for the CAP. The CMAP does not contemplate development of large-scale renewable energy facilities within the City, and so would not be expected to have an adverse effect on Agricultural Resources.

## G. Comparison of the Alternatives

The analysis of the alternatives is summarized and compared in two tables: **Table 8-1** provides a summary of the most severe impact level within each environmental topic area for each of the two alternatives and the Project as proposed (i.e., the CAP), and **Table 8-2** summarizes the ability of each alternative and the Project to meet the objectives of the CAP. The tables provide a ready means for the reader to review and compare the alternatives with each other, and with the CAP, as proposed.

**TABLE 8-1  
ALTERNATIVES IMPACT SUMMARY AND COMPARISON**

<b>Impact</b>	<b>Project</b>	<b>No Project</b>	<b>CMAP Alternative</b>
Visual Effects and Neighborhood Character	Significant and Unavoidable	<u>Lesser Impact</u> Same Impact	<u>Lesser Impact</u> Same Impact
Air Quality	Significant and Unavoidable	<u>Lesser Impact</u> Same Impact	<u>Lesser Impact</u> Same Impact
Biological Resources	Less than Significant	Same Impact	Same Impact
Historical Resources	Significant and Unavoidable	Same Impact	Same Impact
Paleontological Resources	Less than Significant	Lesser Impact	Same Impact
Mineral Resources	Less than Significant	Same Impact	Same Impact
Geology and Soils	Less than Significant	Same Impact	Same Impact
Greenhouse Gases	Less than Significant with Mitigation	Greater Impact	<u>Same or</u> Greater Impact
Health and Safety and Hazardous Materials	Less than Significant	Same Impact	Same Impact
Hydrology and Water Quality	Less than Significant	Same Impact	Same Impact
Water Supply	Less than Significant	Greater Impact	Same Impact
Land Use	Less than Significant with Mitigation	No Impact	Lesser Impact
Noise	Less than Significant	Same Impact	Same Impact
Public Services and Facilities	Less than Significant	Same Impact	Same Impact
Utilities	<u>Less than Significant</u> Significant and Unavoidable	Same Impact	Same Impact
Transportation and Circulation	Significant and Unavoidable	Greater Impact	<u>Lesser Impact</u> Same Impact
Agricultural Resources	Less than Significant	Lesser Impact	Same Impact

**TABLE 8-2  
ABILITY OF ALTERNATIVES TO SATISFY PROJECT OBJECTIVES**

<b>Proposed Project Objective</b>	<b>CAP as Proposed</b>	<b>No Project Alternative</b>	<b>CMAP Alternative</b>
Provide a roadmap to achieve GHG reductions	Meets Objective	Does Not Meet Objective	Meets Objective
Conform to California laws and regulations	Meets Objective	Does Not Meet Objective	Partially Meets Objective
Implement the 2008 General Plan	Meets Objective	Does Not Meet Objective	Meets Objective
Provide CEQA tiering for new development's GHG emissions	Meets Objective	Does Not Meet Objective	<u>Does not</u> Meets Objective
Create green jobs through incentive-based policies, such as the manufacturing and installation of solar panels	Meets Objective	Does Not Meet Objective	Meets Objective
Improve public health by removing harmful pollutants from our air and improve water quality	Meets Objective	Does Not Meet Objective	Meets Objective
Increase local control over the City's future by reducing dependence on imported water and energy	Meets Objective	Does Not Meet Objective	Meets Objective
Enhance quality of life by supporting active transportation, planting trees and reducing landfill waste	Meets Objective	Does Not Meet Objective	Meets Objective
Save taxpayer' money by decreasing municipal water, waste and energy usage in city-owned buildings	Meets Objective	Does Not Meet Objective	Meets Objective

Table 8-1 indicates that 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, and would not meet any of the project objectives. The CMAP Alternative would have somewhat reduced impacts related to ~~land use~~, Land Use, Visual Effects and Neighborhood Character, Air Quality, and Transportation and Circulation because it does not include CAP Action 2.1, which could result in large scale renewable energy facilities, but would not be as effective as the CAP in reducing GHG emissions overall, and would not meet the project objective of providing adequate CEQA tiering for new development.

Table 8-2 indicates that the CAP, as proposed, has the ability to meet stated objectives. The CMAP Alternative also has the ability to meet, or partially meet, most Project objectives. The No Project Alternative would not meet Project objectives.

## **H. Environmentally Superior Alternative**

Based upon the evaluation described in this section, ~~both the No Project Alternative and the CMAP Alternative would have greater~~ fewer impacts related to ~~GHGs~~ Land Use, Visual Effects and Neighborhood Character, Air Quality, and Transportation and Circulation than the proposed CAP. Therefore, the CMAP Alternative ~~Project as proposed~~ is considered the Environmentally Superior Alternative.

# CHAPTER 9

## Certification and Report Preparers

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This document has been completed by the City's Environmental and Resources Analysis (E&RA) Division under the direction of the Planning Department and is based on independent analysis and determinations made pursuant to the San Diego Land Development Code Section 128.0103.

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# CHAPTER 10

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## References

### Multiple Sections

California Environmental Quality Act (CEQA) Statutes and Guidelines; Public Resources Code 21000-21177) and California Code of Federal Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387. 2010.

City of San Diego, 2007. Final Program Environmental Impact Report for the City of San Diego Draft General Plan. State Clearinghouse No. 2006091032

City of San Diego 2008. City of San Diego General Plan, as amended through 2015.

City of San Diego, 2015a. Draft Climate Action Plan. March 2015.

City of San Diego, 2015b. Draft Screening Criteria for Greenhouse Gas Emissions. July 2015.

San Diego Association of Governments (SANDAG), 2011. Our Region, Our Future. 2050 Regional Transportation Plan/Sustainable Communities Strategy. Final Environmental Impact Report, State Clearinghouse #2010041061. October 2011

### Introduction

Port of San Diego, 2013. Climate Action Plan.

Southern California Edison, 2015. *Decommissioning San Onofre Nuclear Generating Station*. Accessed: [http://www.songscommunity.com/decommissioning\\_timeline.asp](http://www.songscommunity.com/decommissioning_timeline.asp), June 16, 2015.

### Land Use

California Natural Resources Agency (CNRA), 2009. 2009 California Climate Adaptation Strategy: A Report to the Governor of the State of California in Response to Executive Order S-13-2008.

City of San Diego, 2015 (as amended). San Diego Municipal Code, Land Development Code.

### Air Quality

California Air Resources Board (CARB), 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*, April 2005.



- California Air Resources Board (CARB), 2009. The California Almanac of Emissions and Air Quality – 2009 Edition.
- California Air Resources Board (CARB), 2013a. The California Almanac of Emissions and Air Quality – 2013 Edition, Chapter 4. Accessed: <http://www.arb.ca.gov/aqd/almanac/almanac13/almanac13.htm>, June 16, 2015.
- California Air Resources Board (CARB), 2013b. Air Quality Trends Summaries, 2009-2013, <http://www.arb.ca.gov/adam/trends/trends1.php>, accessed March 2, 2015.
- California Air Resources Board (CARB), 2013c. Ambient Air Quality Standards. <http://www.arb.ca.gov/research/aaqs/aaqs2.pdf> Standards last updated June 4, 2013.
- California Air Resources Board (CARB), 2013d. Area Designation Maps/State and National. <http://www.arb.ca.gov/desig/adm/adm.htm/>. Accessed March 30, 2015.
- City of San Diego, 2011. California Environmental Quality Act Significance Determination Thresholds. Development Services Department. January.
- National Cancer Institute, 2014. SEER Cancer Statistics Factsheets: All Cancer Sites. National Cancer Institute. Bethesda, MD, Accessed: <http://seer.cancer.gov/statfacts/html/all.html>., June 16, 2015.
- Nowak, David J., 2002. The Effects of Urban Trees on Air Quality. Accessed: [http://www.nrs.fs.fed.us/units/urban/local-resources/downloads/Tree\\_Air\\_Qual.pdf](http://www.nrs.fs.fed.us/units/urban/local-resources/downloads/Tree_Air_Qual.pdf), November 11, 2015.
- San Diego County Air Pollution Control District (SDAPCD), 2002. Air Quality in 2002.
- San Diego County Air Pollution Control District (SDAPCD), 2007. Air Quality in San Diego County 2007 Annual Report.
- San Diego County Air Pollution Control District (SDAPCD), 2009. 2009 Regional Air Quality Strategy Revision. April, 22.
- San Diego County Air Pollution Control District (SDAPCD), 2013a. Air Quality in San Diego 2013 Annual Report.
- San Diego County Air Pollution Control District (SDAPCD), 2013b. 5 Year Air Quality Summary, 2009-2013, <http://www.sdapcd.org/info/reports/5-year-summary.pdf>, accessed March 26, 2015
- United States Environmental Protection Agency (USEPA), 2015. Current nonattainment Counties for All Criteria Pollutants – California. January 1st. Accessed: <http://www.epa.gov/air/oaqps/greenbk/ancl.html#CALIFORNIA>

## Greenhouse Gases

- California Air Resources Board (CARB), 2008. *Climate Change Scoping Plan*, adopted December 11, 2008, re-approved by CARB on August 24, 2011.

- California Air Resources Board (CARB), 2014a. *California Greenhouse Gas Inventory for 2000-2012 — by Category Defined in the Scoping Plan*, March 24, 2014.
- California Air Resources Board (CARB), 2014b. *Climate Change Scoping Plan Update*, May 2014.
- California Energy Commission (CEC), 2006. *Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004*, Staff Final Report. December 2006, CEC-600-2006-013-SF.
- Governor’s Office of Planning and Research (OPR). 2008. *Technical Advisory, CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. June 19, 2008.
- Intergovernmental Panel on Climate Change (IPCC), 2007. *Climate Change 2007: Impacts, Adaptation, and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change* [Parry, Martin L., Canziani, Osvaldo F., Palutikof, Jean P., van der Linden, Paul J., and Hanson, Clair E. (eds.)]. Cambridge University Press, Cambridge, United Kingdom, 2007.
- Intergovernmental Panel on Climate Change (IPCC), 2013: *Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change* [Stocker, T.F., D. Qin, G.-K. Plattner, M. Tignor, S.K. Allen, J. Boschung, A. Nauels, Y. Xia, V. Bex and P.M. Midgley (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA, 2013.
- Seinfeld J. H. and Pandis S. N. *Atmospheric Chemistry and Physics: From Air Pollution to Climate Change*, 1st edition, 1998.
- United Nations Framework Convention on Climate Change (UNFCCC), 2012. *Sum of Annex I and Annex II countries without counting Land-Use, Land-Use Change and Forestry (LULUCF)*, [http://unfccc.int/ghg\\_emissions\\_data/predefined\\_queries/items/3814.php](http://unfccc.int/ghg_emissions_data/predefined_queries/items/3814.php). (For countries for which 2004 data was unavailable, the most recent year was used.)
- United States Environmental Protection Agency (U.S. EPA), 2011. *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2009; Executive Summary*, available online at <http://www.epa.gov/climatechange/Downloads/ghgemissions/US-GHG-Inventory-2011-Executive-Summary.pdf>.
- United States Environmental Protection Agency (U.S. EPA), 2013. *Climate Impacts on Human Health*, <http://www.epa.gov/climatechange/impacts-adaptation/health.html#climate>.
- United States Environmental Protection Agency (U.S. EPA), 2014. *Climate Impacts on Ecosystems*, <http://www.epa.gov/climatechange/impacts-adaptation/ecosystems.html#adapt>.

## Historic Resources

- City of San Diego 2014. *Historical Landmarks Designated by the San Diego Historical Resources Board*.
- City of San Diego, 2015 (as amended). *San Diego Municipal Code, Land Development Code, Historical Resources Regulations and Historical Resources Guidelines*.

U.S. Department of the Interior, National Park Service 1995. Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.

## Transportation and Circulation

City of San Diego, 2006. Pedestrian Master Plan, Final Report. December 2006.

City of San Diego, 2011. Economic Development. Transportation. <http://www.sandiego.gov/economic-development/sandiego/transportation.shtml>. Accessed March, 16, 2015. Updated March 2011.

City of San Diego, 2013a. Bicycle Master Plan, updated December 2013.

City of San Diego, 2013b. Bicycle Master Plan Update Environmental Impact Report.

## Utilities

Calrecycle, 2015. Countywide, Regionwide, and Statewide Jurisdiction Diversion/Disposal Progress Report for the Year 2013. Accessed at: <http://www.calrecycle.ca.gov/LGCentral/Reports/Jurisdiction/DiversionDisposal.aspx>, on February 27, 2015.

County of San Diego, 2012. County of San Diego Countywide Five-Year Review Report Countywide Integrated Waste Management Plan.

San Diego Gas and Electric (SDG&E), 2010. Power Content Label. Available online: [https://www.sdge.com/sites/default/files/documents/2010\\_Annual\\_PowerContentLabel.pdf](https://www.sdge.com/sites/default/files/documents/2010_Annual_PowerContentLabel.pdf).

## Water Supply

City of San Diego, 2011. 2010 Urban Water Management Plan, May 10, 2011.

San Diego County Water Authority, 2011. 2010 Urban Water Management Plan, June 2011. Available online: <http://www.sdcwa.org/2010-urban-water-management-plan>.

San Diego County Water Authority, 2015. San Diego County Water Authority, Water Supplies. Webpage available at: <http://www.sdcwa.org/water-supplies>, accessed February 25, 2015.

# CHAPTER 11

## Mitigation Monitoring and Reporting Program

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### A. Introduction

This Mitigation Monitoring and Reporting Program is designed to ensure compliance with Public Resources Code Section 21081.6 during implementation of mitigation measures. This program identifies at a minimum: the department responsible for the monitoring, what is to be monitored, how the monitoring shall be accomplished, the monitoring and reporting schedule, and completion requirements. A record of the Mitigation Monitoring and Reporting Program will be maintained at the offices of the Entitlement Division, 1222 First Avenue, Fifth Floor, San Diego, CA, 92101. All mitigation measures contained in this Program Environmental Impact Report (PEIS) shall be made conditions of the project as may be further described below.

The proposed Project, i.e., the Climate Action Plan (CAP) is described in this PEIR. The PEIR focused on issues determined to be potentially significant by the City. The issues addressed in the PEIR include land use, visual effects and neighborhood character, air quality, greenhouse gas emissions, historical resources, transportation/circulation, public utilities, and water supply.

Public Resources Code Section 21081.6 requires monitoring of only those impacts identified as significant or potentially significant. After analysis, potentially significant impacts requiring mitigation were identified for land use, visual effects and neighborhood character, air quality, historical resources, and transportation/circulation.

The environmental analysis identified mitigation measures determined to be feasible that would reduce some or all of the potentially significant impacts to a less than significant level for the following issues: land use, visual effects and neighborhood character, air quality, and transportation/circulation however, impacts would not be fully reduced for ~~one~~ the following issue areas: Visual Effects and Neighborhood Character, Air Quality, Historical Resources, and Transportation and Circulation. ~~This~~ These impacts ~~is~~ are potentially significant and unavoidable.

## B. Significant Impacts, Mitigation Measures, Monitoring and Reporting Requirements

### Land Use

**Impact:** implementation of the CAP could conflict with applicable land use plans, policies or regulations of an agency with jurisdiction over the Project.

#### **Mitigation Measure LU-1: Siting of Large-scale Renewable Energy Projects.**

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 prior to permitting any large-scale renewable energy projects. 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 at a minimum:

- 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.
- 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.
- 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; ~~and~~ minimizing visual prominence (for example, by avoiding siting of facilities on ridgelines and other prominent topographical features, or by providing vegetative screens); and minimizing lighting and glare effects (such as adherence to the City's Outdoor Lighting Regulations).
- 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.
- 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.
- A checklist to determine whether, even with adherence to the guidelines provided, a facility may still result in a land use conflict.

## Visual Effects and Neighborhood Character

**Impact:** 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.

**Mitigation:** Implement **Mitigation Measure LU-1.**

**Impact:** 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.

**Mitigation:** Implement **Mitigation Measure LU-1.**

## Air Quality

**Impact:** 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.

### **Mitigation Measure AIR-1: Best Available Control Measures for Construction Emissions.**

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:

- Minimizing simultaneous operation of multiple construction equipment units;
- Use of low pollutant emitting equipment;
- Use of catalytic reduction for gasoline-powered equipment;
- Watering the construction area to minimize fugitive dust; and
- Minimizing idling time by construction vehicles.

### **Mitigation Measure AIR-2: Reduce Emissions from Expanded Recycling and Organics Collection Programs.**

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 NO<sub>x</sub> emissions. This will be 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 NO<sub>x</sub> emissions.

## Historical Resources

**Impact:** 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.

### **Mitigation Measure HIST-1: Archaeological Resources.**

Prior to issuance of any permit for a future development 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.

#### ***Initial Determination***

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.

**Step 1:** 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 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.

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.

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.

**Step 2:** 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.

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 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.

**Step 3:** 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.



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.

**Step 4:** 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.

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.

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.

**Step 5:** 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.

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 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.

## Transportation and Circulation

**Impact:** 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.

**Mitigation Measure TR-1:** 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.

## Water Supply

**Impact:** Implementation of the CAP could result in the excessive use of water.

**Mitigation Measure WS-1: Water Supply Assessment.** 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.

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