

February 12, 2018

San Diego County Board of Supervisors
1600 Pacific Highway
San Diego, CA 92101

**RE: Climate Action Plan (CAP), PDS2015-POD-15-002; PDS2016-GPA-16-007;
LOG NO. PDS2016-ER-16-00-003**

Dear Chair Gaspar and Board of Supervisors:

Climate breakdown is a catastrophic global problem. Fighting climate breakdown is largely dependent upon setting an example for aggressive immediate action that other citizens and jurisdictions will increasingly follow worldwide. The County CAP proposed falls far short of this goal. The environmental document fails to disclose to you and the public the current status of climate breakdown and the consequences of failure to take the most aggressive possible actions. No issue that the Board will consider is more important than correcting the deficiencies in the County CAP.

The County Response to our prior comments claims that we offer “no evidence to support” our assertions of inadequacy for the CAP and EIR. Therefore, we incorporate the evidence in our prior comments by reference and offer the following additional evidence.

The CAP and EIR fail to establish the effective nexus for local and state goals to meet international goals or consider the sufficiency of international goals

Current international agreements are insufficient to keep global warming under the 1.5° to 2°C target required to avoid severe impacts that include an unalterable reinforcing breakdown cycle. The target of below 2 degrees Celsius has been abandoned for a 1.5°C limit in the upcoming sixth IPCC report because science has already documented the inadequacy of a 2°C limit. “2030 emissions will be 12 to 14 gigatonnes above levels needed to limit global warming to 2°C...The world must urgently and dramatically increase its ambition to cut roughly a further quarter off predicted 2030 global greenhouse emissions...”¹ **Current policy results trend toward a catastrophic 3.5°C global temperature increase.**

¹ UNEP Release. *World must urgently up action to cut a further 25% from predicted 2030 emissions*, November 3, 2016

State, Federal and worldwide goals that are critical for avoiding catastrophic climate breakdown disasters cannot be attained without thoughtful committed action of local land use authorities.

California Air Resources Board (CARB) 2017 Climate Change Scoping Plan states,

“Achieving no net additional increase in GHG emissions, resulting in no contribution to GHG impacts, is an appropriate overall objective for new development. There are recent examples of land use development projects in California that have demonstrated that it is feasible to design projects that achieve zero net additional GHG emissions.”²

Yet the County CAP fails to require meaningful actions that would require new development projects to achieve zero net additional GHG emissions.

Aggressive emergency actions are required now due to decades of failure to acknowledge and act upon the impacts of fossil fuel reliance and other human caused emissions that are now manifesting into extreme weather events and firestorms. GHG emissions trap greater solar energy that adds significant fuel into the weather systems that distribute the energy worldwide. Destructive events with vast human and economic costs are rapidly increasing in frequency and magnitude.

Global CO₂ exceeding 407 ppm coupled with the 1°C temperature rise has already resulted in an alarming increase in extreme weather disasters. Climate breakdown may have already reached the point of irreversible feedback or crossed the “tipping point.” **Hence, all GHG emissions are cumulatively significant and should be avoided or mitigated to the maximum extent feasible.**

We must take more aggressive action locally and globally to eliminate the emissions reduction gap required to limit global warming to 1.5°C.³

“If we don’t, we will mourn the loss of biodiversity and natural resources. We will regret the economic fallout. Most of all, we will grieve over the avoidable human tragedy; the growing numbers of climate refugees hit by hunger, poverty, illness and conflict will be a constant reminder of our failure to deliver.”⁴

² California Air Resources Board (CARB) 2017 Climate Change Scoping Plan, p. 151, bold emphasis added.

³ Vidal, John. *UN on wrong track with plans to limit global warming to 2°C, says top scientist...* James Hansen says current ‘half arsed’ plans to reduce emissions will lead to dangerous climate change... December 3, 2015.

⁴ UNEP Synthesis Report Forward by Erik Solheim, Head of UN Environment and Jacqueline McGlade, UN Environment Chief Scientist. *The Emissions Gap Report 2016*, November 2016.

The County is failing to require Community Choice Energy to be adopted as a foundational element of the CAP that has been proven elsewhere to drive the transition to clean energy.

The County is failing to comply with its own General Plan and allowing amendments to be processed for sprawl developments that would cripple any otherwise effective requirements included within the CAP.

Vehicle Miles Traveled (VMT) analysis and reduction measures

The 2017 Climate Change Scoping Plan states that VMT reduction serves as an essential part of GHG emissions reductions, enabling the State to meet its climate change goals:

Stronger SB 375 GHG reduction targets will enable the State to make significant progress toward the goal of reducing total light-duty VMT by 15 percent from expected levels in 2050, but alone will not provide all of the VMT reductions that will be needed. The gap between what SB 375 can provide and what is needed to meet the State's 2030 and 2050 goals needs to be addressed through additional VMT reduction measures.⁵

The 2017 Climate Change Scoping Plan repeatedly emphasizes the importance of VMT reductions. (2017 Climate Change Scoping Plan at pp. 74 [VMT reductions result in important health benefits]; 113 [transportation sector reduction goals include: "Promote all feasible policies to reduce VMT, including: Land use and community design that reduce VMT; Transit oriented development].)

The Plan recognizes that local decisions to reduce VMT are necessary to achieve the 2030 target under SB 32:

While the State can do more to accelerate and incentivize these local decisions, local actions that reduce VMT are also necessary to meet transportation sector-specific goals and achieve the 2030 target under SB 32. ***Through developing the Scoping Plan, CARB staff is more convinced than ever that, in addition to achieving GHG reductions from cleaner fuels and vehicles, California must also reduce VMT.*** Stronger SB 375 GHG reduction targets will enable the State to make significant progress toward needed reductions, but alone will not provide the VMT growth reductions needed; there is a gap between what SB 375 can provide and what is needed to meet the State's 2030 and 2050 goals. In its evaluation of the role of the transportation system in meeting the statewide emissions targets, CARB determined that ***VMT reductions of 7 percent below projected VMT levels in 2030 (which includes currently adopted SB 375 SCSs) are necessary. In***

⁵ 2017 Climate Change Scoping Plan at p. 116.

2050, reductions of 15 percent below projected VMT levels are needed. A 7 percent VMT reduction translates to a reduction, on average, of 1.5 miles/person/day from projected levels in 2030. It is recommended that local governments consider policies to reduce VMT to help achieve these reductions, including: land use and community design that reduces VMT; transit oriented development; street design policies that prioritize transit, biking, and walking; and increasing low carbon mobility choices, including improved access to viable and affordable public transportation and active transportation opportunities. It is important that VMT reducing strategies are implemented early because more time is necessary to achieve the full climate, health, social, equity, and economic benefits from these strategies.⁶

The 2017 Climate Change Scoping Plan makes clear that VMT reduction stands alone as separate and distinct from any plan for mitigating project GHG emissions impacts or other land use policies, including the potential for allowing the purchase of GHG emissions offsets and “offshore offsets.” Because CARB is “more convinced than ever” that VMT reduction is necessary to achieve State GHG reduction targets, local land use decisions may not mitigate increased GHG emissions resulting from VMT generated by new development projects merely by implementing GHG reduction policies that do not also reduce projects’ VMT. The 2017 Climate Change Scoping Plan does not allow for VMT mitigation through measures that do not reduce projects’ VMT. The CAP does not recognize this new policy.

Addressing Climate Change is Urgent and Must be Considered at the Level of Individual Projects

New projects approved by the County claiming consistency with the CAP would emit GHGs directly and encourage the continued burning of fossil fuels indirectly that moves us collectively toward an inhabitable planet. Action to address climate change becomes ever more urgent with each passing day.⁷ Even meeting state mandates is

⁶ 2017 Climate Change Scoping Plan at p. 150 [emphasis added].

⁷ “Humanity today, collectively, must face the uncomfortable fact that industrial civilization itself has become the principal driver of global climate. If we stay our present course, using fossil fuels to feed a growing appetite for energy-intensive life styles, we will soon leave the climate of the Holocene, the world of prior human history. The eventual response to doubling pre-industrial atmospheric CO₂ likely would be a nearly ice-free planet, preceded by a period of chaotic change with continually changing shorelines. Humanity’s task of moderating human-caused global climate change is urgent... Continued growth of greenhouse gas emissions, for just another decade, practically eliminates the possibility of near-term return of atmospheric composition beneath the tipping level for catastrophic effects...The stakes, for all life on the planet, surpass those of any previous crisis. The greatest danger is continued ignorance and denial, which could make tragic consequences unavoidable.” Hansen, James et al. “Target Atmospheric CO₂: Where Should Humanity Aim?” NASA/Goddard Institute for Space Studies, 2008

not enough to avoid severe climatic impacts, which is why individual projects should be designed to be GHG neutral.⁸ **Every avoidable emission increases the severity of the problem as we accelerate toward tipping points where the damage becomes increasingly severe, irreversible and uncontrollable.**⁹

In recent decades civilization has placed its foot to the floor of a sluggish climate accelerator. Now that strong collective action is kicking in, but we are applying little more than a parking brake as government policy appears blinded to the cliff of unalterable climate forcing in the pipeline.¹⁰

“Many aspects of climate change and associated impacts will continue for centuries, even if anthropogenic emissions of greenhouse gases are stopped. The risks of abrupt or irreversible changes increase as the magnitude of the warming increases.”¹¹

The turn of the century has brought 16 of the 17 hottest years on record globally. 2017 was the second hottest year exceeded by only 2016.¹² In the National Climate Assessment released by the U.S. Global Change Research Program, experts make clear that “reduc[ing] the risks of some of the worst impacts of climate change” will require “aggressive and sustained greenhouse gas emission reductions” over the course of this century. (Melillo 2014.) Indeed, humanity is rapidly consuming the remaining “carbon budget” necessary to preserve a likely chance of holding the average global

⁸ Hansen, James et al. “Target Atmospheric CO₂: Where Should Humanity Aim?” NASA/Goddard Institute for Space Studies, 2008.

<http://climate.nasa.gov/vital-signs/carbon-dioxide/>

<http://climate.nasa.gov/evidence/>

⁹ “Effects that scientists had predicted in the past would result from global climate change are now occurring: loss of sea ice, accelerated sea level rise and longer, more intense heat waves” (NASA Global Climate Change Vital Signs of the Planet). “...the net damage costs of climate change are likely to be significant and to increase over time.”- Intergovernmental Panel on Climate Change

<http://climate.nasa.gov/effects/>

¹⁰ “Earth’s response to climate forcings is slowed by the inertia of the global ocean and the great ice sheets on Greenland and Antarctica, which require centuries, millennia or longer to approach their full response to a climate forcing. This long response time makes the task of avoiding dangerous human alteration of climate particularly difficult, because the human-made climate forcing is being imposed rapidly, with most of the current forcing having been added in just the past several decades. Thus, observed climate changes are only a partial response to the current climate forcing, with further response still ‘in the pipeline’.”

Hansen, James et al. “Climate sensitivity, sea level and atmospheric carbon dioxide”, The Earth Institute, Columbia University, NASA Goddard Institute for Space Studies, 2013, p. 2.

¹¹ Intergovernmental Panel on Climate Change, “Climate Change 2014 Synthesis Report Summary for Policymakers,” page 16.

¹² <https://www.reuters.com/article/us-climatechange-temperatures/2017-was-second-hottest-year-on-record-after-sizzling-2016-report-idUSKBN1ET1JF>

temperature increase to 2°C above pre-industrial levels. According to the IPCC, when non-CO₂ forcings are taken into account, total cumulative future anthropogenic emissions of CO₂ must remain below about 1,000 gigatonnes (Gt) to achieve this goal.¹³ Some leading scientists—characterizing the effects of even a 2°C increase in average global temperature as “disastrous”—have prescribed a far more stringent carbon budget for coming decades. (Hansen 2013.) Climate change will affect California’s climate, resulting in such impacts as increased temperatures and wildfires, and a reduction in snowpack and precipitation levels and water availability.

California has a mandate under AB 32 to reach 1990 levels of greenhouse gas emissions (“GHG”) by the year 2020, equivalent to approximately a 15 percent reduction from a business-as-usual projection. Health & Saf. Code § 38550. The state must also reduce emission levels to 80 percent below 1990 levels by 2050. (Executive Order S-3-05 (2005).) In enacting SB 375, the state has also recognized the critical role that land use planning plays in achieving greenhouse gas emission reductions in California.¹⁴

In 2015, Governor Brown issued Executive Order B-30-15 requiring greenhouse gas emissions to be 40% below 1990 levels by 2030. The most recent legislative session passed SB 350, which requires widespread electrification of the transportation sector, half of all power generated to be from renewable sources, and a doubling of energy efficiency in buildings.

The state Legislature has found that failure to achieve greenhouse gas reduction would be “detrimental” to the state’s economy. Health & Saf. Code § 38501(b). In his 2015 Inaugural Address, Governor Brown reiterated his commitment to reduce greenhouse gas emissions with three new goals for the next fifteen years:

- Increase electricity derived from renewable sources to 50 percent;
 - Reduce today’s petroleum use in cars and trucks by 50 percent;
 - Double the efficiency of existing buildings and make heating fuels cleaner.
- (Brown 2015 Address.)

Although some sources of GHG emissions may seem insignificant, climate change is a problem with cumulative impacts and effects. *Ctr. for Biological Diversity v. Nat’l Highway Traffic Safety Admin.*, (9th Cir. 2008) 538 F.3d 1172, 1217 (“the impact of greenhouse gas emissions on climate change is precisely the kind of cumulative

¹³ IPCC 2013 (“Limiting the warming caused by anthropogenic CO₂ emissions alone with a probability of >33%, >50%, and >66% to less than 2°C since the period 1861–1880, will require cumulative CO₂ emissions from all anthropogenic sources to stay between 0 and about 1570 GtC (5760 GtCO₂), 0 and about 1210 GtC (4440 GtCO₂), and 0 and about 1000 GtC (3670 GtCO₂) since that period, respectively. These upper amounts are reduced to about 900 GtC (3300 GtCO₂), 820 GtC (3010 GtCO₂), and 790 GtC (2900 GtCO₂), respectively, when accounting for non-CO₂ forcings as in RCP2.6. An amount of 515 [445 to 585] GtC (1890 [1630 to 2150] GtCO₂), was already emitted by 2011.”). See also UNEP 2013 (describing emissions “pathways” consistent with meeting 2°C and 1.5°C targets).

¹⁴ See <http://www.arb.ca.gov/cc/sb375/sb375.htm>.

impacts analysis” that agencies must conduct). One source or one small project may not appear to have a significant effect on climate change, but the combined impacts of many sources can drastically damage California’s climate as a whole. Similarly, CEQA requires that an EIR consider both direct and indirect impacts of a project. CEQA Guidelines, § 15064.

Recent evidence of Climate Breakdown is further impetus for action

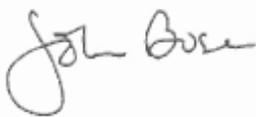
The size and destructiveness of wildfires in California is increasing consistent with rising global land and sea temperatures. Cal Fire has compiled records from 1932 of the “Top 20 Largest California Wildfires” and “Top 20 Most Destructive California Wildfires.” Three out of four of California’s largest fires have occurred within the past five years. Seven out of ten of California’s largest fires have occurred within the past 10 years. Seventeen out of 20 have occurred since 1999. There have been five mega-fires exceeding 200,000 acres since 1932. All five of these fires occurred since the 2003 Cedar Fire in San Diego County. Five of the States most destructive fires in terms of structures lost occurred within the past year.

Ocean temperatures have been on a steady uptrend since 1996. Ocean temperature was the hottest recorded in 2017.¹⁵ The energy stored in the ocean supplies the fuel for the extreme weather events worldwide that have become normalized. Climate scientists are now projecting that the 1.5°C target may be exceeded by 2022.¹⁶ We are cooking ourselves within a cauldron of greed. There can be no tolerance for plans that provide little more than the appearance of taking climate action.

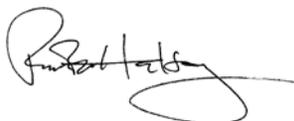
Please correct the deficiencies in the Climate Action Plan. Thank you for considering our comments.



Van K. Collinsworth
Geographer / Director, Preserve Wild Santee



John Buse
Senior Counsel, Center for Biological Diversity



Richard W. Halsey
Director, California Chaparral Institute

¹⁵ <https://www.theguardian.com/environment/climate-consensus-97-percent/2018/jan/26/in-2017-the-oceans-were-by-far-the-hottest-ever-recorded>

¹⁶ <https://www.metoffice.gov.uk/news/releases/2018/decadal-forecast-2018>

References:

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https://www.ipcc.ch/pdf/assessment-report/ar5/syr/AR5_SYR_FINAL_SPM.pdf

Target CO2: Where Should Humanity Aim?

http://www.columbia.edu/~jeh1/2008/TargetCO2_20080407.pdf

Climate sensitivity, sea level and atmospheric carbon dioxide

<http://rsta.royalsocietypublishing.org/content/371/2001/20120294?sid=081258ae-d827-44f8-88c0-0174747c1f05>

Assessing “Dangerous Climate Change”: Required Reduction of Carbon Emissions to Protect Young People, Future generations and Nature

http://www.columbia.edu/~jeh1/mailings/2013/20131202_PopularSciencePlosOneE.pdf

Megadisasters devastated America in 2017. And they’re only going to get worse

<https://www.vox.com/energy-and-environment/2017/12/28/16795490/natural-disasters-2017-hurricanes-wildfires-heat-climate-change-cost-deaths>

How California’s Most Destructive Wildfire Spread, Hour by Hour

<https://www.nytimes.com/interactive/2017/10/21/us/california-fire-damage-map.html>

Many in Montecito ignored mudslide warnings — until it was too late

<http://www.latimes.com/local/california/la-me-montecito-evacuation-20180110-story.html>

Top 20 Largest California Wildfires, Cal Fire, 1/12/2018

http://www.fire.ca.gov/communications/downloads/fact_sheets/Top20_Acres.pdf

Top 20 Most Destructive California Wildfires, Cal Fire, 1/12/2018

http://www.fire.ca.gov/communications/downloads/fact_sheets/Top20_Destruction.pdf