



June 26, 2018

County of San Diego Planning Commission
5510 Overland Avenue, Suite 310
San Diego, CA 92123
Attn: JeRae Bailey

Re: CAC Comments on Use of Offsets as GHG Mitigation & Recommended Denial of Newland Sierra Project

Dear Planning Commission:

Climate Action Campaign (CAC) appreciates the opportunity to comment on the proposed Newland Sierra Project. We oppose the requested actions outlined in the staff report because the project, and its proposed use of offsets as mitigation for greenhouse gas (GHG) emissions, flies in the face of state and local policy objectives and guidance on land use and transportation.

The updated Scoping Plan (2017), California's framework for GHG reduction through 2030, calls for deep cuts in GHG emissions statewide through smart growth, reduced vehicle miles traveled (VMT), and enhanced carbon sequestration in natural and working lands, among other strategies. The Newland Sierra Project would remove 776 acres of primarily chaparral vegetation and would add an estimated 294,804 daily vehicle miles, or 28,862 daily trips, to the road. In other words, the project would do precisely the opposite of what the Scoping Plan outlines in order to avoid the worst impacts of climate change and to foster economic, health, and environmental co-benefits.

Furthermore, in March 2018, the California Air Resources Board (CARB) updated the GHG reduction target from on-road transportation for the SANDAG region to 19% by 2035. At the adoption hearing in Riverside, where CAC advocated for higher targets along with Environmental Health Coalition, Sierra Club, Stay Cool for Grandkids, and other environmental and social justice organizations, CARB emphasized the need for local leadership and collaboration around land use and transportation to reach the targets. The GHG emissions that would result from sprawl like the Newland Sierra project will make it increasingly difficult, if not impossible, to meet the SB 375 emissions reduction target.

In blatantly defying state and regional efforts to promote responsible development in smart growth centers rather than VMT-inducing sprawl, and in thwarting the County General Plan's vision of natural resource protection for future generations and healthy and livable communities, the Newland Sierra project will generate significant air quality impacts through the thousands of daily car trips it produces. Needless to say, those air quality impacts, and their attendant public health consequences, will be experienced locally.



Allowing the purchase of GHG offsets as mitigation would contradict both the vision of the County's General Plan as well as state policy guidance regarding smart growth and GHG reduction. The purchase of overseas carbon credits, many which have a spotty enforcement track record, is no substitute for local emissions reductions and is an unacceptable excuse for continued sprawl development that generates tens of thousands of daily vehicle trips in increasingly fragmented sensitive habitat. If a project cannot reduce emissions below a significance threshold aligned with state targets without the use of offsets, the project should not be developed as planned.

The dual objectives of preserving a livable climate and addressing our statewide housing crisis must be met through smart growth and preservation of natural and working lands, which points the way toward dense infill development, not sprawl. Carbon offsets as GHG mitigation — and especially unlimited and geographically unrestricted offsets — represent an unacceptable loophole that, if permitted, would significantly undermine efforts to grow the region in a way that benefits the economy, public health, and the environment.

For these reasons, we urge the Planning Commission not to allow carbon offsets as a GHG mitigation measure and not to amend the General Plan in favor of the Newland Sierra project.

Sincerely,

A handwritten signature in black ink that reads "Sophie Wolfram".

Sophie Wolfram, Director of Programs
Climate Action Campaign