Case No. D075478

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
FOURTH APPELLATE DISTRICT – DIVISION ONE

SIERRA CLUB, CENTER FOR BIOLOGICAL DIVERSITY, CLEVELAND NATIONAL FOREST FOUNDATION, CLIMATE ACTION CAMPAIGN, ENDANGERED HABITATS LEAGUE ENVIRONMENTAL CENTER OF SAN DIEGO, AND PRESERVE WILD SANTEE,
Plaintiffs and Respondents,

vs.

COUNTY OF SAN DIEGO,
Defendant and Appellant.

On Appeal from the San Diego County Superior Court
Case Nos. 37-2018-00014081-CU-TT-CTL
37-2018-00013324-CT-TT-CTL
37-2018-00101054-CU-TT-CTL
Judge Hon. Timothy Taylor

APPLICATION TO FILE AMICUS BRIEF AND AMICUS CURIAE BRIEF OF CALIFORNIA STATE ASSOCIATION OF COUNTIES IN SUPPORT OF DEFENDANT AND APPELLANT AND IN SUPPORT OF REVERSAL

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TO BE FILED IN THE COURT OF APPEAL

APP-008

COURT OF APPEAL Fourth APPELLATE DISTRICT, DIVISION One	COURT OF APPEAL CASE NUMBER: D075478
ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NUMBER: 244014 NAME: Verne Ball FIRM NAME: Office of County Counsel, Sonoma County STREET ADDRESS: 575 Administration Drive, Rm. 105A CITY: Santa Rosa STATE: CA ZIP CODE: 95403 TELEPHONE NO.: 707 565 2421 FAX NO.: E-MAIL ADDRESS: verne.ball@sonoma-county.org ATTORNEY FOR (*name*): California State Association of Counties	SUPERIOR COURT CASE NUMBER: 37-2018-00014081-CU-TT-CTL
APPELLANT/ PETITIONER: County of San Diego RESPONDENT/ REAL PARTY IN INTEREST: Sierra Club, et. al	

CERTIFICATE OF INTERESTED ENTITIES OR PERSONS

(Check one): [X] INITIAL CERTIFICATE [ ] SUPPLEMENTAL CERTIFICATE

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1. This form is being submitted on behalf of the following party (*name*): California State Association of Counties

2. a. [X] There are no interested entities or persons that must be listed in this certificate under rule 8.208.
   b. [ ] Interested entities or persons required to be listed under rule 8.208 are as follows:

Full name of interested entity or person	Nature of interest *(Explain):*
(1)	
(2)	
(3)	
(4)	
(5)	

[ ] Continued on attachment 2.

The undersigned certifies that the above-listed persons or entities (corporations, partnerships, firms, or any other association, but not including government entities or their agencies) have either (1) an ownership interest of 10 percent or more in the party if it is an entity; or (2) a financial or other interest in the outcome of the proceeding that the justices should consider in determining whether to disqualify themselves, as defined in rule 8.208(e)(2).

Date: 10/26/19

Verne Ball
(TYPE OR PRINT NAME)

(SIGNATURE OF APPELLANT OR ATTORNEY)

APPLICATION FOR PERMISSION TO FILE AMICUS CURIAE BRIEF IN SUPPORT OF DEFENDANT AND APPELLANT

TO THE HONORABLE PRESIDING JUSTICE:

Pursuant to Rule 8.200(c) of the California Rules of Court, the California State Association of Counties ("CSAC") respectfully requests permission to file the brief that is combined with this application.

The California State Association of Counties (CSAC) is a non-profit corporation. The membership consists of the 58 California counties. CSAC sponsors a Litigation Coordination Program, which is administered by the County Counsels' Association of California and is overseen by the Association's Litigation Overview Committee, comprised of county counsels throughout the state. The Litigation Overview Committee monitors litigation of concern to counties statewide and has determined that this case is a matter affecting all counties.

Each county in the state has an interest in consistent rules of interpretation for general plans, as well as the avoidance of rules that create traps for the unwary in the context of greenhouse gas emissions. For the reasons also explained in the proposed brief, the applicant wishes to address:

- The trial court's conclusion that offsets do not reduce "local" or "community" emissions. The trial court's errors are based on judicial intuitions about space and geography that do not take into account the emissions attribution methodology used in San Diego County, as elsewhere. The trial court's limited analysis failed to consider the emissions attribution

methodologies that are used throughout the state. These methodologies are not solely based in geography.

- The need for judicial review of programmatic offset mitigation measures to be conducted at the programmatic, not the project level.
- The need for rules of interpretation for general plans that are grounded in precedent, especially in the case of greenhouse gas reductions, such that disincentives to address greenhouse gas planning are not inadvertently created by the courts.

The applicant's counsel has examined the briefs on file in this case, as well as the Climate Action Plan at issue, and is familiar with the issues involved and the scope of the presentations. The applicant's counsel is also aware of the statewide issues presented to local governments by the issues presented. The applicant respectfully submits that there is a need for additional briefing regarding the potential statewide impact of a decision by this Court. The applicant respectfully requests leave to file the amicus curiae brief that is combined with this application.

The amicus curiae brief on behalf of the California State Association of Counties was authored by Verne Ball. No party, person, or entity made a monetary contribution to fund the preparation of this brief.

Dated: October 26, 2019 Respectfully submitted:

By: /s/ Verne Ball
Verne R. Ball
Attorneys for California State Association of Counties

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I. INTRODUCTION AND INTEREST OF AMICUS

This case raises questions about the interplay of interpretations of common general plan terminology with the California Environmental Quality Act (CEQA). The outcome of this case is of interest to all counties in California.

The California State Association of Counties (CSAC), is a non-profit corporation. The membership consists of the 58 California counties. CSAC sponsors a Litigation Coordination Program, which is administered by the County Counsels' Association of California and is overseen by the Association's Litigation Overview Committee, comprised of county counsels throughout the state. The Litigation Overview Committee monitors litigation of concern to counties statewide and has determined that this case is a matter affecting all counties.

Each of CSAC's members has a general plan and each is tasked with analyzing greenhouse gas emissions pursuant to CEQA. Each of CSAC's members has an interest in consistent rules of interpretation for general plans and an interest in adjudication that does not create unanticipated and unnecessary obstacles to greenhouse gas mitigation.

II. FACTS AND PROCEDURAL HISTORY

Rather than restate the facts and procedural history in detail, CSAC adopts the description of facts as set forth in the Appellant's opening brief.

III. ARGUMENT

A. San Diego County Is Entitled to Deference in Its Interpretation of Its Own General Plan, and Its Interpretation Is Well Grounded in Consensus Protocols.

In contesting San Diego County's ("county") interpretation of its general plan ("plan"), Respondents argue that no deference is owed to the county. To the contrary, when reviewing an agency's consistency decision based on its own general plan, courts consistently afford "great deference." (*San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal.App.4th 1, 26; *Save Our Peninsula Committee v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 142.) The Respondents' burden is to show that "no reasonable person could have reached the same conclusion." (*A Local & Regional Monitor v. City of Los Angeles* (1993) 16 Cal.App.4th 630, 648.) Respondents appear to argue for a textual review that divorces the plan's language from the record and the plan's context. Again to the contrary, Respondents' burden is to show unreasonableness "based on all of the evidence in the record," and not solely based on the language in the plan. (*Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 696.)

Respondents' arguments come nowhere near this standard, and it is particularly important that the Court review the record in this case.

The San Diego County General Plan set goals for reducing "local" or "community" emissions. The county emphasized the prioritization of geographically local actions, but it did not view its goal as incompatible with allowing extraterritorial offsets. Accordingly, the county adopted mitigation measures that allowed for the possibility of emissions reductions through offsets, which could be extraterritorial. The trial court tersely found that allowing extraterritorial offsets violated the county's general plan based on geographic assumptions, and with no discussion of emissions attribution methodologies.

First, the trial court erred when it attributed significance to the location of emissions and emissions reductions that neither science nor legal precedent supports. "[T]he global scope of climate change and the fact that carbon dioxide and other greenhouse gases, once released into the atmosphere, are not contained in the local area of their emission means that the impacts to be evaluated are also global rather than local. For many air pollutants, the significance of their environmental impact may depend greatly on *where* they are emitted; for greenhouse gases, it does not." (*Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 219-220; *Association of Irritated Residents v. Kern County Bd. of Supervisors* (2017) 17 Cal.App.5th 708, 742 [summarizing and following

Center for Biological Diversity, stating "the significance of the environmental impact of greenhouse gases does not depend on *where* they are emitted because of the global scope of the climate change impact"].)

Second, the trial court erred when it based its interpretation of the words "community" and "local" solely in geography, without considering authority and causation. Authority and causation, not simply geography, are the cornerstones of the greenhouse gas emissions inventories that are conducted throughout the state. The trial court seems to have thought of "emissions" as located in a readily identifiable space, like cans of beans on a shelf. What resulted was a fairly simplistic assumption about emissions within jurisdictional lines – with some in, and some out.

The trial court did not consider the possibility that the terms "community" and "local" referred to the origins of causal processes, not to the geographic limits of those processes. The problem with the trial court's approach is that emissions inventories are not so simple. Activities within a jurisdiction will have extraterritorial effects, some of which will increase emissions, and some of which will decrease emissions.

The county correctly focused on authority and causation, not just space, in evaluating the community's emissions. Specifically, a review of the Climate Action Plan reveals that the county evaluated community emissions using the International Council for Local Environmental

Initiatives' (ICLEI) "U.S. Community Protocol."[1] (AR 21629, 21883.) The state has endorsed this protocol for inventory preparation,[2] and jurisdictions across the state rely upon it.[3] Collective reliance on the U.S. Community Protocol allows for "apples to apples" comparisons between jurisdictions and avoids the many issues of double counting that arise when attributing emissions to different jurisdictions.

The core of what the U.S. Community Protocol teaches is that a community's emissions are those that the local government has the capacity to affect and influence, not simply the emissions that happen to be countable within its boundary. The U.S. Community Protocol is a long, complicated document,[4] but examples are illustrative. Because communities rely on power plants in other communities, other states, and

[1] The county also used the ICLEI "Local Government Operations Protocol" for county operations. Nothing in that protocol changes the discussion below.

[2] Governor's Office of Planning and Research, State of California General Plan Guidelines (2017), at 223, 226, available at http://opr.ca.gov/docs/OPR_COMPLETE_7.31.17.pdf.

[3] For example, the U.S. Community Protocol was used for the Unincorporated Los Angeles County Community Climate Action Plan 2020 (2015), referenced in the county's reply brief (Unincorporated Los Angeles County Community Climate Action Plan 2020, at 2-1).

[4] Version 1.1 of the U.S. Community Protocol is in the Administrative Record at AR 370:35456-35523 without most appendices. The current version of the U.S. Community Protocol is 503 pages with appendices, and is available at http://icleiusa.org/publications/us-community-protocol/

other countries,[5] the extraterritorial emissions caused by community power consumption are part of the community's emissions inventory. (AR 21820, 21914-21915, 21918.) The flipside is that if emissions will occur within a political jurisdiction's boundary, but the local government lacks jurisdiction over those emissions, then those emissions are not part of the community emissions. For example, major stationary sources for which there is no local regulatory jurisdiction are excluded (AR 21820), as are emissions from activities on federal and tribal lands (AR 21815), as are any pass through vehicle trips (AR 21822-21823). The U.S. Community Protocol's trip analysis method is consistent with the State's SB 375 Regional Targets Advisory Committee guidance, which the county also used. Under the guidance, if there is a vehicle trip between Los Angeles and San Diego, the trip is to be divided in half for the purposes of inventory attribution, with one half assigned to Los Angeles and one half assigned to San Diego, and with none of the trip assigned to intermediary jurisdictions.[6] In other

[5] The Climate Action Plan used San Diego Gas & Electric conversion factors, and the utility can and does reduce its emissions by procuring renewable power that is nowhere near San Diego. When San Diego's utility (or community choice aggregator) procures geothermal energy in Northern California or wind power in Montana, it reduces community emissions. The western power grid notably extends from Canada to Mexico. (Department of Energy map of the Western Interconnection, available at https://www.energy.gov/oe/services/electricity-policy-coordination-and-implementation/transmission-planning/recovery-act-0).

[6] Recommendations of the Regional Targets Advisory Committee (RTAC) Pursuant to Senate Bill 375 (2009) at 26, available at https://ww3.arb.ca.gov/cc/sb375/rtac/report/092909/finalreport.pdf.

words, the task is to attribute emissions based on authority and local causation,[7] not simply to count emissions within jurisdictional lines.

When one considers the attribution methodologies used for analyzing a community's emissions, it is very clear that the county's interpretation of its plan was reasonable. The emissions that a local government has the ability to reduce may be nearby or they may be remote. Offsets reduce "local" or "community emissions" by virtue of the fact the community is capable of influencing those emissions, not due to jurisdictional boundaries. Other local agencies and the state take the same approach. If a local government can achieve remote reductions through contracts, procurement, or other actions that have extraterritorial effects, then those are community emissions reductions, and there is no legitimate environmental reason to rob the local toolbox of those tools.

[7] As the Supreme Court has held in the National Environmental Policy Act context, when evaluating the capacity of an agency to affect the environment, the issues of causality and authority are intertwined. (*Department of Transportation v. Public Citizen* (2004) 541 U.S. 752, 770 ["where an agency has no ability to prevent a certain effect due to its limited statutory authority over the relevant actions, the agency cannot be considered a legally relevant 'cause' of the effect."]; *Metro. Edison Co. v. People Against Nuclear Energy* (1983) 460 U.S. 766, 774, fn. 7 ["In the context of both tort law and NEPA, courts must look to the underlying policies or legislative intent in order to draw a manageable line between those causal changes that may make an actor responsible for an effect and those that do not."].).

The county's interpretation is correct, and the contrary interpretation would lead to absurd results. This is because at least since 1972,[8] CEQA has required an analysis of extraterritorial impacts, and arbitrarily truncating the analysis based on jurisdictional boundaries is not permitted. (*E.g.*, *City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341, 359 [lack of extraterritorial authority, on its own, is not an excuse not to analyze and mitigate extraterritorial impacts where there are means to do so]; *American Canyon Community United for Responsible Growth v. City of American Canyon* (2006) 145 Cal.App.4th 1062, 1082 [a failure to analyze extraterritorial impacts is a CEQA violation].) Respondents' interpretation in this case would thus lead to the absurd result that agencies much consider and mitigate extraterritorial impacts of a project, but cannot consider how extraterritorial greenhouse gas reductions might serve as mitigation for a project.

Embracing Respondents' theory would also lead to confusion and pointless complexities, as it would create traps for the unwary in reconciling court interpretations of planning language with consensus

[8] 58 Ops. Cal. Atty. Gen. 614, at p. 18-19 (1975) [discussing the statutory change in 1972 from "environment of the state" to "environment"]; (*City of Marina v. Board of Trustees of California State University* (2006) 39 Cal.4th 341, 360 ["CEQA requires a public agency to mitigate or avoid its projects' significant effects not just on the agency's own property but "*on the environment*" (Pub. Resources Code, § 21002.1, subd. (b), italics added) …"])

methodologies for attributing emissions. It would also sanction mischief, where individuals or communities claim credit for reducing emissions within local borders, even in cases where the result of the community's regulatory approach is the increase in emissions outside the jurisdiction.[9] (*Cf. Muzzy Ranch Co. v. Solano County Airport Land Use Com.* (2007) 41 Cal.4th 372, 383 [the extraterritorial housing effects of a local freeze on development are project impacts under CEQA].)

In sum, the trial court erred by relying on its own intuitions, rather than considering the planning framework that this county, like other local agencies, actually uses. At a minimum, a reasonable person could agree with the county's construction of its own plan. The county's interpretation of its own general plan should therefore be upheld.

B. Respondents Are Not Entitled to Any Inference that the County Will Utilize Offsets that Are Not Offsets, and the Court Should Not Make Rulings on Offsets that Are Not Before It.

The county's mitigation measure (M-GHG-1) allowed for offsets, as is explicitly permitted by the CEQA guidelines. (14 Cal. Code Regs. § 15126.4, subd. (c)(3)). A great deal of Respondents' briefing ignores a

[9] Economists refer to the phenomenon where intra-territorial greenhouse gas regulation leads to extra-territorial emissions increases as "leakage," and it is a concern in attempts to reduce emissions. While the extent of the problem is debated, there is no debate about the proposition that causation does not stop at a jurisdiction's borders. (*See generally* Katherine A. Trisolini, *All Hands on Deck: Local Governments and the Potential for Bidirectional Climate Change Regulation*, 62 Stan. L. Rev. 669, 683-687 (2010).)

simple legal fact: Where a mitigation measure requires "offsets," "non-offsets" will not satisfy the mitigation measure. Respondents devote substantial time to argument that the mitigation measure at issue lacks performance standards. A programmatic offsets requirement does not require performance standards because the requirement itself *is* a performance standard – in this case, a reduction "sufficient to offset all GHG emissions from the project." If a non-offset (i.e., any action that does not produce the claimed reduction) is used as an offset, the mitigation measure will be violated. Offsets are used in water quality regulation, air quality regulation, and to protect habitat, and as noted in the county's Opening Brief, there is broad consensus about the components of a valid offset. (County of San Diego's Opening Brief at 46.)

Respondent Sierra Club's statements about "purported reductions" are similarly misplaced, in that they involve non-programmatic considerations of matters that are not before the court. Agencies have multiple ways of ensuring performance, and the issue of the exact implementation of a particular future project's requirements under Public Resources Code section 21081.6(c) is not before the court. Local agencies have a plethora of means to enforce mitigation measures. The tools range from regulatory tools (e.g., code enforcement), to transactional tools (e.g., contractual enforcement, bonds, letters of credit, and so on). Likewise, courts know how to address post-approval violations where agencies or

private parties do not do what they say they will do. (*See Ventura Foothill Neighbors v. County of Ventura* (2014) 232 Cal.App.4th 429, 436 [addressing a case where a building was built that was different from the building that was analyzed, and rejecting the argument that the statute of limitations for newly discovered violations ran 30 days from the approval's Notice of Determination].)

Respondents are attacking a programmatic mitigation measure with project level criticisms that are not addressed to a particular project. Respondents' contentions about improper implementation of the mitigation measure's requirements in the future are not properly before the court. (*Pacific Legal Foundation v. California Coastal Com.* (1982) 33 Cal.3d 158, 174; see also *El Morro Community Assn. v. California Dept. of Parks & Recreation* (2004) 122 Cal.App.4th 1341, 1361 ["judicial review is limited to the CEQA determination for the project approved"].)

There is no question that offsets must be real. The project level details do matter, but they do not matter in the context of a detailed programmatic mitigation measure that is abundantly clear about the standard that must be met. The court should be wary of the invitation to sweeping rulings in this case that could affect the discretion of local governments to utilize offsets as mitigation. The economic rationale for offsets is that some actors can achieve environmental benefits more inexpensively than others. Given the economic challenge of addressing

climate change, there is no public or environmental purpose in arbitrarily making efforts to address climate change more expensive. The Court should decline Respondents invitation to invalidate the county's mitigation measure M-GHG-1.

IV. CONCLUSION

The county's interpretation of its own general plan should be upheld. The county's logic is reasonable and grounded in consensus protocols that are used throughout the state. By using the narrow lens of geographic boundaries, the trial court below gave cursory consideration to a key issue – the attribution of emissions and reductions. It did not apply the long-standing deferential standard of review for general plan interpretations.

The trial court also appears to have adjusted its CEQA scrutiny based on the fact that the threat to the global climate is "the signal environmental issue of our times." The problem with this approach is that it discourages urgently needed planning by signaling that uncertain rules apply in this context.

In the interest of allowing climate action planning to go forward, and in the interest of not creating perverse disincentives to addressing pressing environmental problems, CSAC respectfully urges reversal.

Dated: October 26, 2019 Respectfully submitted:

By: _____/s/ Verne Ball_____
Verne R. Ball
Attorneys for California State Association of Counties

CERTIFICATE OF WORD COUNT

The text of this brief consists of 2,761 words according to the word count feature of the computer program used to prepare this brief.

DATED: October 26, 2019

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