



March 13, 2018

Mayor Ritter and City Council members City of Vista 200 Civic Center Drive, Vista, CA 92084.

RE: Sierra Club North County Group Recommendation on Vista Climate Action Plan Update.

Dear Mayor Ritter and City Council:

The Sierra Club North County Group (NCG) represents 2,700 members in the inland North County area. We stand in strong support for action by local governments to respond to the crisis of climate change.

NCG fully supports the city's work and process related to the Climate Action Plan update. We thank you for your commitment and the opportunity to comment early in the process. We are writing today to respectfully request that Vista consider the following comments and recommendations.

A. Requirements of the Climate Action Plan (CAP)

The NCG highly recommends the following commitments in the Vista CAP update.

- 1. First and foremost, the NCG strongly urges Vista to follow San Diego, Chula Vista, and Del Mar in adopting a **100% clean energy goal for the city**. Such a goal is not pie-in-the-sky (if it ever was) any more. The technology is available, the economics are sound--all that is needed is the political will.
- 2. CAP must be enforceable and effective.
- 3. CAP should have clear and aggressive **energy and water use reduction and efficiency goals** with strong implementing ordinances.
- **4.** The CAP should include **visionary transportation actions** such as reducing vehicle miles traveled, municipal conversion to clean vehicles and **clear, implementable plans to shift commuter modes of travel** in concert with those of San Marcos, San Diego, Del Mar, Carlsbad and National City.
- 5. **CAP should prioritize actionable smart growth strategies** and build on the **complete streets program** we understand Vista included in its first CAP.
- 6. CAP should include a commitment and timeline **to achieve zero waste** such as included in the San Diego and Del Mar CAPs.
- 7. CAP should develop aggressive **tree canopy goals to reduce heat islands** especially in neighborhoods that struggle with cooling infrastructure.
- 8. CAP should **extend GHG targets to at least 2030,** and preferably, to 2050 given the speed at which our climate in warming.
- 9. There are new sections that should be added to the CAP including **social justice and equity**.

NCG would like to underscore a couple of the recommendations above.

CAP should include an analysis of a Community Choice Energy program.

This kind of initiative could reduce emissions, lower costs, provide cleaner energy, and generate revenue for the city. Recently, it was reported in the San Diego Union Tribune¹ that Oceanside has joined three other North County cities to evaluate how a community choice energy alternative might work for their residents and businesses.

We hope that, as part of the update process, Vista will either join or conduct its own analysis of how CCE might work for the city. The more cities that participate, the lower the cost to each city. This opportunity is a bargain for the city to receive a professional analysis that can provide well-founded research on if and how a community choice plan could work for Vista.

Already, five cities, including the two largest, San Diego and Chula Vista, have made commitments in their Climate Action Plans to achieve 100% clean energy. A community choice energy plan is a good way to achieve that goal.

Other cities in California already have community choice energy program. Depending on the design of the program, the local government has the potential to secure lower cost, cleaner energy for its businesses and residents and may, in fact, create revenue for the city as well. Some community energy programs, such as those in Sonoma and Marin counties, yield millions of dollars to local governments. Solana Beach announced the establishment of the first in the County recently.² The only way to know if such a program could work for Vista is to do a feasibility study.

Addressing Social Equity in CAP Implementation

One important, but not well understood issue, is how CAP implementation could address social injustices and prevent future injustice. Equitable CAP Implementation would address patterns of underinvestment, address existing community impacts, and proactively plan for long-term health and quality of life. Director the Program for Environmental and Regional Equity at USC, Dr. Manuel Pastor and other researchers have defined three dimensions of equitable policy implementation. We have based our comments with heavy reliance on this guidance.

- To address deficiencies in the past, addressing social equity in the CAP would prioritize
 investments that will close racialized gaps, especially by wealth, environmental burden,
 and existing amenities in a way that will improve work and economic and health
 opportunities for underinvested communities.
- To ensure that inequities are not worsened, the CAP should involve partnership throughout the process that centers the perspectives of vulnerable communities, that supports authentic community-based participation and power, and that results in shared decision-making, while also strengthening the health and well-being of the entire region.
- For future planning, equity would require government to plan for the future by leveraging funding for long-term community health and organizational capacity, mitigate future harm

¹ http://www.sandiegouniontribune.com/communities/north-county/sd-no-energy-study-20180205-story.html

that may result from new investments in a place, and incorporate metrics and evaluation to promote adaptable and effective implementation.³

We would welcome the opportunity to work with your staff on any of these issues.

B. Climate Adaptation Plan

Because, as a society, we did not act sooner, we are now experiencing the negative impacts of a warming climate. More extraordinary fires, floods, and drought can be expected in the future, exacerbated by poor urban planning. We recommend the Vista CAP include adaptation planning. At a minimum, the following should be addressed:

- 1. Analysis and action plans to preserve critical infrastructure and land uses.
- 2. Cessation of building new development in fire and flood prone areas.
- 3. Establishment of cooling centers for residents in at-risk areas and a plan to inform the public about their availability.

Thank you for your work and openness thus far. We look forward to working with you and your staff to develop a Climate Action and Adaptation Plan worthy of our city, our region, and our world.

Sincerely,

Laura Hunter, NCG Conservation Chair Kathleen Davis, NCG ExCom member and Vista resident Chris McCardle. NCG member and Vista resident

cc. Mr. John Conley

³ Vanessa Carter, Manuel Pastor, and Madeline Wander. 2018. Measures Matter: Ensuring Equitable Implementation of Los Angeles County Measures M & A. Available at http://dornsife.usc.edu/pere/measures-matter-la/