



North County Group
Sierra Club San Diego
P.O. Box 2141
Escondido, CA 92033

March 21, 2018

Mr. Mike Strong, Assistant Planning Director
City of Escondido
201 N. Broadway
Escondido, CA 92025

RE: Sierra Club North County Group Recommendations for Escondido Climate Action Plan Update.

Dear Mr. Strong:

The Sierra Club North County Group (NCG) represents 2,700 members in the inland North County area. We appreciate that the city is working on an Update to its Climate Action Plan. As the outlook becomes more dire, the need for assertive action, at every level, is ever more imperative.

We reviewed the response to our February 12, 2018 letter from Mayor Abed regarding the Clean Energy Feasibility study. It was news to us that the city already studied this 'several years ago', however, things have changed rapidly in the past few years. Technology has improved immensely, but so has the threat to planetary stability which are worsening and accelerating beyond what was expected. The Climate Action Plan Update will be a great opportunity to revisit this issue again in context of current realities.

NCG is writing today to respectfully request that Escondido consider the following comments and requests to improve your climate action development process and CAP.

There are three key areas where the city can greatly improve its process in this iteration of the Escondido Climate Action Plan (E-CAP). These include:

1. Increased public participation in the planning;
2. Improve the range and quality of commitments in the E-CAP; and,
3. Include a climate adaptation plan or element in the E-CAP.

We offer specific recommendations on these three topics below.

A. Climate Action and Adaptation Planning process

The NCG was encouraged by our conversation with you regarding the public involvement the city is considering. We strongly support a robust engagement plan for many reasons. First, the public is an important resource of knowledge and will benefit the process. Further, it can create community ambassadors for a quality climate plan. We request that the city of Escondido includes a public involvement schedule that will provide multiple opportunities for the public to engage in this issues.

The most critical times for public input prior to release of a draft will be:

- A scoping of the work needed and questions needing analysis.
- Evaluation of any contractors to be used.
- Review and development of climate actions to be proposed
- Review and development of climate adaptation actions to be proposed.

An important addition to the next E-CAP would be to add a public implementation taskforce and Annual Monitoring Plan. This taskforce should meet regularly and in public. There should also be a monitoring update report given at a publicly noticed meeting annually.

Requirements of the Climate Action Plan

NCG highly recommends that the developers of the E-CAP review the Climate Action Campaign's two Climate Action Plan Report Cards. These are a great resource to see what other cities in the region are accomplishing with their climate planning and upon which we can base our own.¹ It is clear, if each city does its part, we can make a huge collective impact on the reducing climate change.

1. First and foremost, the NCG strongly urges Escondido 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. E-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. As leaders of the city, there is no credible reason not to fully study this issue and have the benefit of current data and conditions. Solana Beach has recently created their own community choice energy program.²
3. E-CAP must be **enforceable and effective**.
4. E-CAP should have clear and aggressive **energy and water use reduction and efficiency goals** with strong implementing ordinances.
5. The E-CAP should include **visionary transportation actions** to reduce 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. E-CAP should build on the city's commitment **to implement an updated bike plan**.
6. **The city's commitment to actionable smart growth strategies** and a robust **complete streets program** such as San Diego, San Marcos, and Vista have adopted should be part of the E-CAP.
7. E-CAP should include a commitment and timeline **to achieve zero waste** such as included in the San Diego and Del Mar CAPs.
8. E-CAP should develop aggressive **tree canopy goals to reduce heat islands** especially in neighborhoods that struggle with cooling infrastructure.
9. E-CAP should **extend GHG targets to at least 2030**, and preferably, to 2050 given the speed at which our climate is warming.

¹ <https://www.climateactioncampaign.org/reportcard2017/>, <https://www.climateactioncampaign.org/climate-action-plan-report-card/>

² <http://www.sandiegouniontribune.com/communities/north-county/sd-no-solana-energy-20180301-story.html>

10. There are new sections that should be added to the E-CAP including **social justice and equity**.

Escondido could lead the way in addressing Social Equity in CAP Implementation

One important, but not well understood, issue is how CAP implementation could address social injustices, build equity, 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 of 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 below with heavy reliance on this guidance.³

- 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. In Escondido, this could mean that the CAP focus efficiency and solar programs in neighborhoods that are traditionally left out of redevelopment and improvement. An E-CAP might direct first and most resources (solar, energy and water efficiency, tree canopy, walking and biking trails, etc...) in areas of the city designated in the State's CalEnviroScreen as overly burdened with pollution or as disadvantaged or where housing stock has not been upgraded.
- To ensure that inequities are not worsened, the CAP should involve partnership throughout the process that is inclusive of the perspectives of vulnerable communities, that supports authentic community-based participation and power, and results in shared decision-making, while also strengthening the health and well-being of the entire region. In Escondido, this could mean workshops in impacted areas that traditionally have no cooling systems in homes, targeting tree cover, energy efficiency, and cooling centers close to these neighborhoods.
- For future planning, equity would require that government takes into account the future by leveraging funding for long-term community health and organizational capacity, avoid or mitigate future harm that may result for new investments in a place, and incorporates metrics and evaluation to promote adaptable and effective implementation. In Escondido, this could mean re-considering the location of the water treatment plant out of the proposed location and moved to a less impacted neighborhood, further from any residents. It would also mean ending consideration of annexations that allow development in high-risk areas that will draw considerable community financial resources away from existing areas needing investment in infrastructure and other needs.

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

³ Adapted from, 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/>

future, exacerbated by poor urban planning. The E-CAP does not include adaptation planning and it should. At a minimum, significant work must be done in these areas:

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.

As with the E-CAP, the adaptation plan should be done through a public process.

A Caution

As you may have heard, on Friday, the Sierra Club and six other leading environmental organizations in the region filed two legal challenges against the County's Climate Action Plan.

In the first case the County failed, again, to adopt an enforceable CAP. In the second, the use of anywhere-in-the-world carbon offsets to pretend to address the need to reduce GHG emissions is completely unconscionable and unacceptable. Josh Chatten-Brown of Chatten-Brown & Carstens, the attorney for the case stated the problem well, *"... the County essentially allows unbridled development in far-flung areas provided that developers purchase carbon offsets from anywhere in the world. Such offsets may be completely illusory and would not benefit the residents of San Diego as offsets attained through local projects would."* To the extent, one of your contractors, Ascent, is responsible for this approach, we caution you to temper their advice. We did not support it for the County and we cannot support it in the city of Escondido.

NCG will be tracking that none of the most egregious aspects of the County CAP do not appear in the next E-CAP. Please understand, we are at a crossroads in our region and if we fail to address this issue now, we will not get another chance. The stakes could not be higher for our future. We would welcome a chance to meet with you on this topic if you wish.

In closing, when it comes to climate action there are two distinct camps emerging in our county. One group, includes the County of San Diego that continually fails to adopt an adequate plan and continually finds itself losing in court.

The other group is poised to lead the nation on this issue. The Navy and Marines based in San Diego have taken serious action on climate issues since 1990. The city of San Diego adopted the 'gold standard' of a Climate Plan. Chula Vista, Del Mar, Encinitas, and many other cities are following suit.

We urge the City of Escondido to join the latter club.

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,

Kelly Conrad, Chair

Laura Hunter, Conservation Chair

Suzi Sandore, Escondido resident

Richard Miller, Escondido resident