



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

November 26, 2018

Mayor and City Council
Mayor-Elect Paul McNamara
Council member-Elect Consuelo Martinez
City of Escondido
201 N. Broadway
Escondido, CA 92025

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

Dear Mayor, Councilmembers, Mayor-Elect, and Councilmember-Elect:

The Sierra Club North County Group (NCG) understands you will be receiving an update and providing direction to the staff regarding the Escondido Climate Action Plan (E-CAP) on Wednesday. This hearing date is merely two weeks before a new city council with new leadership is seated.

Our first request is that this issue be delayed to a time after the new Mayor and Council are installed.

As the outlook becomes more dire, the need for assertive action, at every level, is ever more imperative. Not only the Intergovernmental Panel on Climate Change¹, but even the Trump Administration released a report² which reveals what our nation will suffer if we do not act soon and aggressively. The 1600-page National Climate Assessment report--produced by 13 federal agencies and 300 scientists, at the request of Congress, confirms that climate change is "affecting every sector." It will be important for the E-CAP process to review and consider the realities contained in this report.³

What the staff is stating as "confirmation of results" from the public process is unclear. Since many issues, important to our membership, are not included in the staff analysis, we will restate them here.

NCG requested requirements of the Climate Action Plan

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.

¹ <https://www.nytimes.com/2018/10/07/climate/ipcc-climate-report-2040.html>

² <https://www.latimes.com/newsletters/la-me-ln-essential-california-20181124-story.html>

³ <https://nca2018.globalchange.gov/>

2. The 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 program⁴ and San Diego has announced their intention to.
3. The E-CAP must be **enforceable and effective**.
4. The E-CAP should include a section and specific actions to address **environmental justice and social equity**.
5. The E-CAP should have clear and aggressive **energy and water use reduction and efficiency goals** with strong implementing ordinances.
6. 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**.
7. **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.
8. The E-CAP should include a commitment and timeline **to achieve zero waste** such as included in the San Diego and Del Mar CAPs.
9. The E-CAP should develop aggressive **tree canopy goals and canopy retention commitments to reduce heat islands** especially in neighborhoods that struggle with cooling infrastructure.
10. The E-CAP should **extend GHG targets to at least 2030**, and preferably, to 2050 given the speed at which our climate is warming.
11. The E-CAP should prioritize all electric building for new construction.
12. The E-CAP should include education priorities for the city that will help build a **culture of climate protection** among residents.

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.⁵

- 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 the E-CAP, this could mean that the**

⁴ <http://www.sandiegouniontribune.com/communities/north-county/sd-no-solana-energy-20180301-story.html>

⁵ 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/>

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 the E-CAP, this could mean workshops and involvement in impacted areas that traditionally have no cooling systems in homes, which help residents improve tree cover, energy efficiency, and establishing 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 the E-CAP, this could mean increasing parks and green space in park deficient areas, target efficiency and solar programs in impacted areas, and even re-considering the location of the water treatment plant and move to a less impacted neighborhood, further from any residents. It would also mean ending annexations and project that propose development in high-risk areas that will draw considerable community financial resources away from existing areas needing investment in infrastructure and other needs.**

A. 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. The E-CAP should also include adaptation planning. 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

We repeat our caution related to following the wrong direction of the County on out-of-region mitigation or failure to adopt an enforceable CAP. The County has been sued and lost on both of these fronts. We will repeat the comments of Josh Chatten, our attorney for the case who stated it 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."

We did not support out-of-region mitigations for the County and we will not support it in the city of Escondido.

We hope Escondido does not make the same errors as the County.

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.

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 and recently committed to 100% clean energy. Other cities are following suit.

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

We look forward to working with our future city leaders and your staff to develop a Climate Action and Adaptation Plan worthy of our city, our region, and our world.

Sincerely,



Laura Hunter, Conservation Chair
Sierra Club North County Group

cc. Escondido Planning Commission
Mr. Jeff Epp, City Manager
Mr. Mike Strong, Project Director