



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

May 5, 2020

Mayor Jones and City Council
City of San Marcos

San Marcos, CA

Via Email

RE: Sierra Club NCG comments on San Marcos General Plan Update

Dear Mayor and City Council:

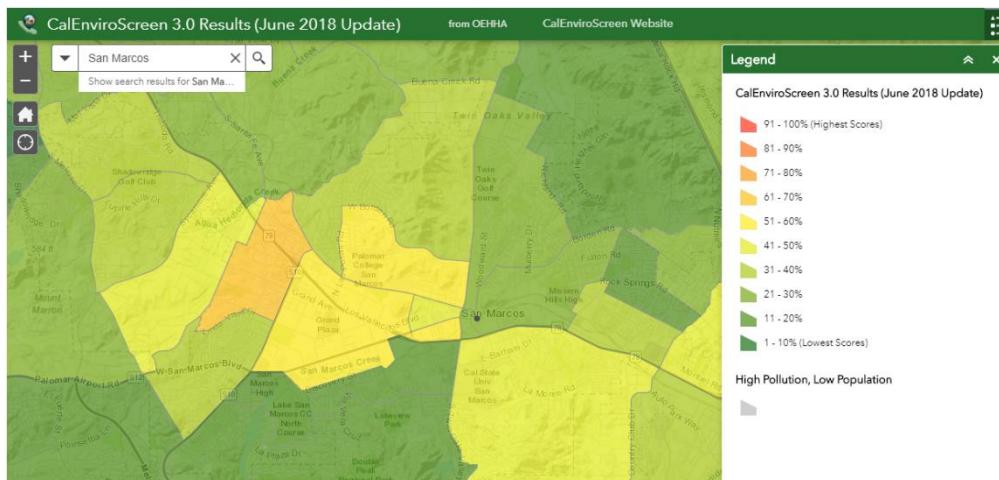
The North County Group (NCG) of the Sierra Club represents over 270 members in San Marcos and over 2,500 in North County. The General Plans in cities where our members live are critically important documents for creating a sustainable future for the region.

We understand that San Marcos is underway in its process of the General Plan Update (GPU) so we would like to offer some general comments while it is under development.

A. Required Environmental Justice Element should build on data in the state CalEnviroScreen

Fortunately, due to the hard work of the California Environmental Justice Alliance (CEJA) and their member organizations, environmental justice is a required element of general plans. Sierra Club NCG encourages the city to build on the information already included in the CalEnviroScreen 3.0, the results of which are shown below.

In particular, data for census tract 6073020018 (below in orange) ranked as 65=70% with high pollution burdens and high in health and community characteristics such as low-birth weights, linguistic isolation, and poverty.



An example of an excellent Environmental Justice Element can be found in the National City General Plan.¹

B. General Plan is excellent opportunity to update and adopt a SubArea Habitat Conservation Plan under the MHCP.

While the city was part of the earlier Multiple Habitat Conservation Plan, it never completed or adopted its required SubArea Plan. This has been very concerning as the city has often relied on the plan as if it had been reviewed and adopted, but it has not. This has caused a lot of conflicts for the city and residents in the past and subjected the city to litigation. We request that the city take this opportunity to improve, revise, and adopt its SubArea plan. In addition, it is very important the wildlife corridors are preserved and protected in the GPU.

C. Climate Action is Critical.

We understand the city is working to update its Climate Action Plan (CAP). The state's 2018 CA 4th Climate Change Assessment: San Diego Regional Report² found that San Diego County will be increasingly affected by climate change in future decades and will be confronted with, among others, increasingly warmer average temperatures, more frequent and likely more intense heat waves, more intense droughts, occasionally increased heavy rainfall events and floods, continuing Santa Ana winds and wildfire threats.

It is timely that cities intensify their actions to address the climate crisis on multiple fronts for the panoply of climate change related impacts on residents, development, infrastructure, and ecosystems.

We support recommendations made in the most recent Climate Action Campaign Report Card be implements in the CAP and adopted into the General Plan and enforceable measures. The CAP should include a mode share target for transit and for biking and walking. The CAP should continue and improve its vehicle miles travelled (VMT) reduction target.

To comply with the state's carbon neutrality goal, Executive Order B-55-18, we recommend the CAP update establish a Zero Carbon target and adopt a 100% clean energy target with Community Choice Energy (CCE) as a key strategy to achieve it.

Further, we recommend that the city adopt policies to fully electrify all new development and develop a policy on micro-grids and other pilot projects that reduce fossil fuel use and provide increased energy security.

The CAP should also include a zero-waste target, mode share targets for biking, walking, and transit, an urban tree canopy target, and a commitment to social equity.

D. Support a new vision for a world-class transit system and supporting Land Use policies

¹ <http://www.nationalcityca.gov/Home>ShowDocument?id=5019>

² <https://www.energy.ca.gov/sites/default/files/2019-07/Reg%20Report-%20SUM-CCCA4-2018-009%20SanDiego.pdf>

Sierra Club is strongly supportive of the visionary work that is going on at SANDAG to develop an effective transit system for the region. The General Plan update is a perfect place for San Marcos to support and facilitate that effort.

In addition, policies in the General Plan that reject sprawl development and focus on housing near job centers and transportation corridors and transit should be developed and committed to in the GPU.

E. Housing policies should focus on urban infill with higher density projects located near transit

In addition to lowering climate-altering carbon emissions, higher-density housing near transportation corridors has a benefit of reducing transportation costs which are the second highest expenditure and financial burden to households. In addition to the considerable environmental benefits, putting housing closer to jobs also lowers the transportation burden for lower and middle-income households.

In San Marcos this is significant. Transportation costs are 24% of the household budget with the average household spending close to \$1,300 a month on transportation.³ In California, sprawl patterns have created a higher transportation burden due to longer commutes such that, for anything over a twelve mile commute, the transportation costs outweigh any savings in housing.⁴

National Sierra Club has a strong urban infill⁵ policy. Development should be dense, inclusive, and located within or connected to existing communities and neighborhoods. New development should be designed to make neighborhoods walkable, and neighborhoods in the city and metropolitan contexts should be linked together by convenient high-quality transit prioritized in regional, state, and national transportation expenditure plans

F. Critical General Plan Elements must be fully updated.

1. Safety Element: Per SB379, codified in Government Code section 65302 (g) (4), climate change adaptation and resilience must be addressed in the safety element of all general plans in California. Most critical is the updating of hazard maps to incorporate the latest scientific evidence regarding the effects of climate change. In particular, those which must be updated are risks from wildfire, terrestrial flooding, landslide and unstable slopes.

2. Water Quality, Water Resources, Adaptation, and Integrated Regional Water Management Planning: The GPU should consult the American Planning Association Regional and Intergovernmental Planning Division Policy Handbook on Regional Water Planning for Climate Resilience which outlines the importance of habitat conservation plan and their implications of water resource planning. This handbook identifies best practices to guide local and regional practitioners in community planning and development, specifically related to promoting resilience of water infrastructure.

³ https://htaindex.cnt.org/fact-sheets/#_https://htaindex.cnt.org/fact-sheets/?focus=place&gid=2281

⁴ <http://www.reconnectingamerica.org/assets/Uploads/pubheavyload1006.pdf>

⁵ <https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u19041/SClub%20Infill%20Policy%202019-05-18.pdf>

Though examples range from across the country, chapter seven details innovative case studies from San Diego County. The GPU should reflect San Diego's planning efforts and include regional water resource planning, regional water quality planning, regional habitat conservation planning, integrated regional water management planning, regional and local planning for hazard mitigation and climate change adaptation, and the [San Diego Region Report](#) that was produced in conjunction with [California's Fourth Climate Change Assessment](#).

3. Support preservation of agriculture and regenerative farming as a high priority.

An emerging effort to address the climate crisis is the idea of regenerative or 'carbon' farming. Carbon farming or regenerative agriculture can reverse climate change within our lifetime. The data show that if implemented on a larger scale than currently practiced, regenerative agriculture — from home gardens to increased permaculture practices could draw millions or billions of tons of carbon into the soil worldwide. As an area with significant agricultural use, San Marcos would be an excellent location for promotion of these kinds of agricultural practices.

Not only can carbon farming sequester great quantities of carbon currently in the atmosphere, it also offers resilience in the face of drought and flooding. Bringing carbon into soil builds soil organic matter, which improves the soil's ability to capture water. This can help prevent runoff during floods and increase water retention during times of drought. For every 21 tons of carbon sequestered per hectare (2.5 acres), soil organic matter goes up about one percent, which in turn increases the soil's ability to hold water by 25,000 gallons.

Because it involves high levels of on-farm biodiversity, regenerative carbon farming produces lucrative combinations of food, fiber, building materials and biofuel. It also protects water resources, pollinators and wildlife habitat, and improves soil quality and productivity.

4. Parks and open spaces for recreation should be a high priority.

In its [2010 Parks for Everyone report](#), the San Diego Foundation evaluated green and park spaces throughout San Diego County and identified areas needing significant improvement in the amount and type of public parks spaces for communities. San Marcos had several areas found to be under-served. Sierra Club urges San Marcos to use the opportunity of the General Plan Update to improve upon this situation.

Now is the time to plan for a very different future for the city.

The current shutdown of our 'normal' functions can also provide an opportunity to city leaders and planners. We think now is the time to begin to plan what can be done both to get people back to work once any normalcy returns and to plan for a better, more equitable, more just, more resilient future.

Our membership has been looking into what the COVID-19 crisis and the climate crisis have in common and what they both can tell us about what needs to be done in the future. Although different, it does provide a unique perspective and opportunity to consider the number of parallels regarding climate change and in the way our society thinks about and copes with global problems of this magnitude.

For example, climate change, like the COVID-19, is major threats that will take serious effort and behavioral and economic shifts to achieve. Both of these will ultimately require “all hands-on-deck” participation to resolve, and there is a necessity for strong governmental measures and leaderships at all levels, along with a high degree of participation at the residents, government, and private sector.

The pandemic has also underscored a general lack of emergency preparedness plans and resources overall, and these first couple months we've been witness to challenges to get even stopgap measures in place. Here planning for adaptation and resiliency will make future events like this one less painful.

Most importantly, this pandemic is laying bare the reality of inequity and injustice (in many forms) in our country. While some communities have resources to be somewhat insulated from the acute fallout, more residents in our most vulnerable populations are bearing the brunt of the impact—health, economic, and environmental. It is these communities that need to be prioritized. As climate change is a much slower moving yet irreversible disaster of high-levels of complexity, it is now even more visible that a reordering of priorities and social structures will be needed to address it. We need to collectively realize just how important it is initiate proactive and meaningful plans and actions now if we are to create a sustainable community that will achieve long-term health and safety for all.

If nothing else, COVID-19 has demonstrated in clear terms, we are all one community- interconnected and dependent on each other for our health, safety, and wellbeing. If we can learn these lessons, we know we can create more liveable, sustainable communities in the future.

Sierra Club NCG appreciates the opportunity to comment on this important planning issue and we look forward to working with you. We can be contacted at conservation@sierraclubnrg.org.

Sincerely,

Laura Hunter
Chair
NCG Conservation Committee

Kathy Steel
San Marcos resident and member
NCG Conservation Committee