

Escondido Community Advisory Group on Climate and Environmental Action
Subcommittee on Equitable and Effective Measures for the ECAP



October 26, 2020

Escondido Planning Commission

City of Escondido

Via Email

RE: ECAG comments on current draft Climate Action Plan

Dear Planning Commissioners,

The Escondido Community Advisory Group on Environmental and Climate Action (ECAG) expresses our appreciation to City Staff for putting forth the revised draft Climate Action Plan (ECAP). We would like to acknowledge the many significant improvements made since the initial draft release, as well as request a few additional changes for your consideration as the plan continues to move forward.

1. Areas of Significant Improvement in the latest draft ECAP

The ECAG **strongly supports** the changes made on the following topics:

- Elevation of social equity and use of Cal Enviroscreen data to designate Priority Investment Neighborhoods. (PIN's)
- Inclusion of Climate Ambassadors program
- Clean Energy Equity Plan
- Clean energy and clean transportation priority for PINs
- 90% waste diversion goal & plan for Zero Waste
- Improvements in urban forestry actions, and one tree per resident 2088
- Recommendation to avoid siting development in high risk & fire-prone areas
- Achievement of 100% renewables and zero-carbon energy by 2030
- Inclusion of Multiple Species Habitat Conservation actions
- Focus on riparian zones by improving the JRUMP and calling out partnerships for restoring riparian and habitat areas
- Adaptation focus on local food sourcing and community garden support

- Commitment to coordinate on free Youth Passes and Electric Buses
- Inclusion of CAL Fire funding application
- And many other aspects!!

2. Areas Still in Need of Improvement

There are still a few areas that we would like to see bolstered and improved. As staff responses noted, there are several areas and initiative proposals where the decision was deferred to the Council, and where a few important recommendations were not accepted.

Here are some changes that we request in the document you forward to the City Council:

A. Include at least 1 FTE Staffing along with creation of a Climate Commission for ongoing implementation

A plan without a commitment to resources for sustainment will ultimately fail. Successful implementation of this new CAP will involve the City Council, Planning Commission, a full time Sustainability or Climate Coordinator to lead planning and coordination across City departments, the establishment of a new Climate Commission, and coordination with other current boards and commissions.

Therefore, to ensure successful & timely implementation of ECAP plans & initiatives, we STRONGLY request that a commitment be made to install a full-time equivalent staff member to serve in a Climate Plan coordinator capacity, alongside the creation of a community-based Climate Commission.

The ECAG recommends the Climate Commission include representative stakeholders and experts to provide ongoing program support and guidance, identification of potential funding sources, partnerships. The commission will also be responsible for the monitoring of implementation, and will serve as a clearing house for information about the ECAP.

The Climate Commission should be required to meet quarterly (at a minimum) to discuss and review progress in implementing the ECAP initiatives, including, but not limited to:

1. Developing recommendations to Planning Commission and City council about future actions that have a nexus with climate issues.
2. Assisting with identification and support of grant and program funds
3. Advising on the Community Choice Energy Feasibility Study findings and proposals
4. Advising city on legislative positions

5. Providing a public forum for climate-interested residents to interact, learn, and share information.

Finally, significant staff resources are requisite to pursue cross collaboration with the San Diego Association of Governments (“SANDAG”), the County of San Diego, other public and private agencies, and adjacent cities to implement strategies and measures requiring cohesive regional partnership. The limited resources available annually to the City does not allow every strategy and measure to be funded and implemented simultaneously.

B. Move up many target dates for action

We want to reiterate and repeat our request to request that many actions/measures be achieved on an earlier time schedule than is currently specified, and in instances where it makes sense, also include iterative timetables and objective milestones. All of these recommendations are included in our earlier commentary submittal. Many of the ECAP initiatives are of critical value/importance, but when the timelines are set too far out, it nullifies the opportunity for progress. For example, we believe it is important to achieve 90% diversion of solid waste by 2030 and to synchronization traffic signals over the new few years (not 2030). And in some cases, an initiative is simply a “consideration” or an “evaluation” line item, and not a measure itself. We recognize the importance of capturing these in the ECAP (for example, feasibility studies), however our stance is that they should not have timelines set 4-5 years+ down the line.

C. Create a stand-alone existing Home Retrofit Program in Chapter 3

We appreciate the new commitment to evaluate the feasibility of a home retrofit program in Chapter 3. However, it is confusing in that it appears only as a ‘Supporting Action’ and only in the heater-heater section. Home retrofits can include much more than that such as home insulation, water conservation, light bulb upgrades and many other actions.

We also know it is feasible to do such a program and there are many ways to design it. We request that a specific, stand-alone Performance Metric be added with a target and goal.

This is increasingly important as the [data show that California](#) is not achieving the reductions needed in a few categories including residential and commercial buildings with one analyst pointing out, “California’s clean energy policies are working to clean up the electricity sector, But in other sectors — notably transportation, industry and residential and commercial buildings — policy isn’t on track to achieve California’s climate laws.

D. Add all SANDAG Smart Growth areas to Measure T-3.6 Increase Transit Commuters Among New Downtown Residents

The plan to reduce vehicle miles traveled is still very weak. We concur with staff that this is a difficult nut to crack, but it is one of the most critically

important areas of focus for a northeast county city of commuters. We request the following be included In Measure T-3.6:

Increase proportion of community using transit in all Smart Growth areas designated by SANDAG.

E. Include actions related to plastic in Solid Waste action and improve performance date.

We request the following edits (in yellow) in the Performance metrics under Measure S-8.1

- Work with the franchise waste hauler and other partners to assess the infrastructure needed to support composting and waste diversion goals.
- Develop a Zero Waste Plan that includes **plastics reduction** to support zero waste programs. Without a plastics focus, 90% diversion is virtually impossible.
- Prioritize community education to **PIN's** (priority investment neighborhoods) and **local businesses**
- Start building the necessary infrastructure for waste diversion and anaerobic digester processing.
- Move up the citywide **diversion rate goal for 90%** to 2030

Supporting Actions Edits:

- Explore opportunities with franchise waste hauler and other local business organizations to develop and encourage participation in commercial food scrap collection and **plastics reduction** programs.
- **Explore partnership with the Escondido School Districts to work on Zero Waste Schools Initiative.**

F. Add water conservation actions for existing residential and commercial properties.

Water use, especially in our region, is a huge contributor to GHG emissions. The current actions in the ECAP unfortunately apply only to city properties and new projects, and so we request that the following additions be made for existing properties as well. Please note that a program is not the same as a mandate or regulation. It can also consist of education, soliciting funding assistance, and voluntary. Water conservation and building retrofits make so much sense, and we are confident that these programs will be successful if they are in place. This can also be easily be dovetailed into the home retrofit program:

1. Develop program to reduce residential and commercial landscape water consumption

2. Measure to make water efficiency inspections free upon request, as well as required for home plumbing & irrigation after home sale or new rental occupancy

G. Add removal of development potential on habitat lands to increase carbon sequestration in Chapter 3, Measure C-9.3

We strongly support the intent expressed in the adaptation chapter to avoid density in high-risk areas. However, this action can also contribute to climate improvements as well. We request that a commitment to remove the development potential for at least **500 residential units** on chaparral open space by 2020 and ensure its preservation as carbon sequestration. Such an action could be responsible for hundreds of tons of carbon sequestration per year.

H. Bring carbon neutrality in alignment with State goal of 2045

We appreciate the inclusion of an intention to bring the city to carbon neutrality. The ECAG requests that this goal be consistent and in alignment with the State of California goal of achieving it by 2045.

I. Remove increase of fire modification zones and refocus fuel breaks in A 2-3.

In order to **reduce resource costs** and to **prevent more flammable conditions**, we wish to modify the "implementation of brush clearing and fuel breaks" to contain the following:

- Focus on maintaining current fuel breaks from being overtaken by exotic, flammable grasses.
 - As ecological disturbance in chaparral contributes to more flammable conditions with the influx of weeds, research has shown that *fewer, more strategically placed and maintained* fuel breaks have a greater impact on fire management.
- Limit fuel breaks to areas along the wildland–urban interface, instead of remote or backcountry areas, where firefighters will have better access to the fuel breaks.
 - It's been demonstrated that fuel breaks will typically not stop fires without firefighter presence.

In order to protect homes from wind-driven embers, we request **deletion of the intent to expand the fire modification zone to 150ft or 200 ft.**

- A CalFire EIR acknowledged that these kind of modification zones are not effective in the wind-driven fires we have locally. Creating a 200- foot zone

instead of a 100-foot zone will, in too many cases, just mean larger weedy and flammable areas around vulnerable homes.

- Wind-blown embers, which can travel one mile or more, were the biggest threat to homes in the [2007] Witch Creek Wildfire [San Diego County, CA]. There were few, if any, reports of homes burned as a result of direct contact with flames" from wildland fuels. Removing vegetation past 100 ft leaves homes more vulnerable to traveling embers, especially since bare areas are known to proliferate embers.

Syphard, A.D., J.E. Keeley, T.J. Brennan. 2011. Comparing fuel breaks across southern California national forests. Forest Ecology and Management 261: 2038-2048.

Koo, E, R.R. Linn, P.J. Pagni, and C.B. Edminster. 2012. Modeling firebrand transport in wildfires using HIGRAD/FIRETC. International Journal of Wildland Fire 21: 396-417.

In closing, we would like to iterate our sincere thanks and gratitude to Community Development Director Mike Strong, as he has spent considerable time listening, brainstorming, and working with us closely towards the positive goal of addressing the climate crisis. We truly hope this has been both an educational and rewarding experience/process for all involved, and the ECAG feels that if we can work towards making the above noted changes and inclusions, we indeed will succeed in securing (& implementing!) the best Climate Action Plan in the County!

Sincerely,

Tim Swift