

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



January 29, 2021

Mayor and City Council
City of Escondido
Via Email

Re: ECAG recommendations for the Escondido Climate Action Plan Update

Dear Mayor and City Council,

The Escondido Community Advisory Group on Environmental and Climate Action (ECAG) has been very active since our inception in February 2020. The ECAG formed two subcommittees, one to support a Single-Use Plastics ban in the city, and the second to provide framework & commentary and ultimately to support a 'gold-standard' climate and adaptation plan for the city. We were hugely inspired by the commitment of the city council, we have fully participated in the ECAP process for the past year, and we met again on January 26, 2021 to develop our final recommendations. As a result, we urge the City Council to make the following amendments to the ECAP prior to its adoption.

A. Revised actions in Solid Waste actions to include plastics and improve performance date.

We strongly support the inclusion of a Zero-Waste policy in the ECAP. However, the lack of language related to the role of single-use plastics is a serious omission. In fact, to support zero waste programs, without a plastics focus, 90% diversion is virtually impossible. The ECAG makes the following edits requests, and Director Mike Strong, when queried at the Planning Commission meeting said he did not object to these edits. We ask the Council to adopt the changes in **yellow** below.

- *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 single-use plastic reduction measures in order to meet waste diversion goals.*
- *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*

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



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.*

B. Commit to implementation of Community Choice Energy

The commitment to achieve 100 percent clean renewable energy is expected to yield the largest reduction in the ECAP (over 42,000 MT). The **only way** to achieve such reductions is through a **community choice energy** program. The city should designate a date by which the city will join an aggregation program.

“City will join a community choice aggregation program as soon as possible, and no later than 2023”

C. Adopt an Adaptation Measure to develop a Green Infrastructure Plan.

Unifying many of our earlier recommendations around parks, riparian restoration, urban forest, and shade along walk/bike paths to encourage quality of life and alternatives to transportation, we created a new recommendation which includes many of these options in a coordinated plan.

“Develop a Green Infrastructure Plan for Urban Escondido to maximize parks, open space, natural water quality improvements, green rights-of-way, trails, riparian restoration areas, and other measures to create a plan to ensure connected and accessible green space throughout the city.”

D. Restore and improve the staff recommendation to avoid development in high-risk fire zones.

The staff supported Adaptation action under **Measure A-2.3: Build capacity of adaptive neighborhoods** previously read:

“Avoid the siting of new land use densities (i.e. density increases) in very high fire hazard areas and identify areas within the General Plan planning area where future development should be avoided, reconsidered, or mitigated due to fire hazards.”

Avoiding development in natural ecosystem areas has high desirability as it significantly reduces GHG emissions via carbon sequestration and reducing VMT. In addition, as more

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



and more residents receive letters that their fire insurance is being cancelled, we strongly recommend restoring this adaptation action in Measure A-2.3. Premiums and nonrenewal

rates have skyrocketed in California's fire prone regions since 2015, as insurers say the market in some fire prone regions simply isn't sustainable. As of March 31st 2021, another 235,000 existing homes in these "very high fire hazard areas" will no longer be insurable in the voluntary market, where homeowners are now subsequently seeking out last-resort FAIR plan insurance options that offer only limited protection at premium rates two to three times that of previous voluntary comprehensive coverage. With wildfires growing larger and more intense in the coming years, this situation will only become exacerbated, and therefore it is critical for the ECAP to identify areas within the General Plan where future development should be avoided due to extreme fire hazards.

We recommend the following be restored and strengthened to the Climate Action Plan.

"Avoid the siting of new land-use densities (i.e. density increases and annexations) in 'Very High Fire Hazard' areas. Development in native wildlands & chaparral ecosystems significantly decreases carbon sequestration, threatens critical wildlife, expands vehicle miles traveled, and poses significant fire risk to humans and property."

E. Add inclusionary housing and investigate Tiny Home housing ordinances to Measure A-2.2: Create "climate safe and decent" housing options.

The California Air Resources Board's 2018 report on SB 375 implementation identified a need to provide more affordable housing choices near jobs and transit to help reverse the trend in rising Vehicle Miles Traveled (VMT). The following should be added to the ECAP.

"Adopt an inclusionary housing ordinance and investigate tiny home ordinances."

F. Bring ECAP in closer alignment with Executive Order N-79-20 setting a goal related to purchase of electric vehicles

Governor Newsom's recent executive order [N-79-20](#) states:

It shall be a goal of the State that 100 percent of in-state sales of new passenger cars and trucks will be zero-emission by 2035. It shall be a further goal of the State that 100 percent of medium- and heavy-duty vehicles in the State be zero-emission by 2045 for all operations where feasible and by 2035 for drayage trucks. It shall be further a goal of the State to transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.

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



Now that state law will prohibit the sale of new cars and light trucks fueled by gas or diesel in California after 2035, the goal for city purchase of electric vehicles should be greatly increased. Measure T-1.1, which currently set a goal of only 11 new EVs by 2035, is insufficient. Fleet 'Life of Service' and depreciation schedules warrant planning and integration beginning now. Infrastructure including electric/solar charging systems, training and purchase strategies are all elements our fleet manager should be addressing now, as opposed to waiting until it becomes an emergency. **We recommend that the city set a goal of 60% conversion of the fleet by 2030 and complete the rotation of conversion of the municipal fleet by 2035.**

G. Establish a Climate Commission

The ECAG requests that the City Council implement the ECAG and Planning Commission recommendation to establish and support a Climate Commission to oversee and support implementation, new partnerships, identification of funding sources, and assure accountability. The Commission needs to be tasked with a focus on implementing climate mitigation and adaptation and should be comprised of issue area experts, business, residents, and community stakeholders. We oppose assigning ECAP oversight to the Planning Commission without significant changes to membership and operations.

It is our experience that, in part due to the planning and development role of the Planning Commission, its current leadership and a majority of Commissioners do not have a strong grasp of climate change impacts, understanding of proven strategies to address them, and/or a commitment to address the issue. In the absence of a Climate Commission, a Council Subcommittee including the Mayor and open to the public would be preferable to assigning this role to the Planning Commission.

H. The City Council must either add or restore GHG reduction measures to be consistent with the draft CEQA analysis.

The Council should address the deficiency created by Measure T-2.3 from the draft plan. These actions were planned for 9,032 MTCO_{2e} of reductions. This was a significant reduction and was not replaced with other reductions. The Council should restore the original recommendation and the reductions to align with the CEQA documents. Otherwise, the plan cannot be qualified, does not meet minimum state standards, and the General Plan is undermined.

Further, a CAP that only minimally meets the GHG reduction goals, is not what the Council requested or what we support. We recommend that reductions in excess of the minimum standard be restored in one of the following ways, both which result in an ECAP 7,000 MT above minimum requirement.

- a. Restore the original, reasonable measure with performance dates;

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



or

- b. Adopt the compromise offered by Commissioners Serrato and Barba to extend the 2030 performance date to 2035 which would recapture 5,000 MT of those lost **and** accelerate purchase of electric vehicles by the city and seek grant funding to subsidize resident purchase of electric vehicles a (bicycles/cars) equivalent to 1,000 MT by 2035 and adopt a home retrofit program equivalent to 1,000 MT by 2035.

With these additions/revisions made to the ECAP, we support the ECAP as a truly 'gold-standard' climate action plan. We wish to thank Mike Strong for his help, support, and openness during this process. From our work over the past year and after the most destructive wildfire season CA has seen to date, it has become clearer with every passing day that strong & immediate climate action is mandatory for a desirable & livable future to indeed be possible.

We have enjoyed being of service to the city in this way.

Sincerely,

Escondido Community Advisory Members

Tim Swift, Aisha Wallace-Palomares, Ana Maria Velasco, Richard Miller, Maria Wallace, Mat Vasilakis, Kate Barba, Laura Hunter, Christine Nava, Janis Jones, Phil Church, Gwen Smith, Thor Emblem III