



February 9, 2021

Mayor and Council
201 N. Broadway
Escondido, CA 92025
Via Email

RE: Climate Action Campaign comments on the City of Escondido's Climate Action Plan Update

Honorable Mayor and City Councilmembers,

Climate Action Campaign is a non-profit organization based in San Diego and Orange County with a simple mission: stop the climate crisis through effective policy action. We have played an active role in the development of every Climate Action Plan (CAP) in the region since 2015, and we release an annual [Report Card](#) evaluating the strength of cities' CAPs and their implementation .

Throughout the process of Escondido's CAP Update, we have shared best practices and our recommendations for this critical planning document,, and provide an additional letter today with our highest level recommendations

We would like to thank City staff for the latest round of updates in response to community input to make this key document even stronger for Escondido, including the new commitment to 100% clean energy. However, the CAP draft still has critical areas for improvement, and we offer the following recommendations to make the Escondido CAP gold standard:

Commit to Zero Carbon by 2045 or Sooner

While we appreciate City Staff envisioning carbon neutrality by 2045, Escondido must commit to carbon neutrality to meet today's climate science.

To align with state targets and the latest climate science, we urge the city to align the CAP with EO-B-55-18, and commit to zero carbon as soon as possible, and by 2045 at the latest. Recent announcements to commit to zero carbon CAPs from County Supervisor Terra Lawson Remer and City of San Diego Mayor Todd Gloria underscore the importance of local governments making this commitment to protect their residents.

The UN IPCC Special Report on Global Warming of 1.5°C and other recent scientific reports warn that we must achieve net zero emissions by mid-century and negative emissions thereafter if we are to avoid the most devastating impacts of the climate crisis, including extreme drought, floods, heatwaves, and poverty for hundreds of millions of people.

In recognition of the importance of planning for these goals, over 77 countries, 10 regions, and 100 cities have committed to achieving net-zero emissions by 2050 or sooner. Additionally, the State has also recognized this goal through Executive Order B-55-18, which aims to achieve carbon neutrality by 2045. The CAP Update presents a critical opportunity for San Diego to realign our climate planning efforts with the targets identified by climate science, as well as statewide goals.

For strong examples of plans committed to zero carbon, we recommend referring to the [City of Los Angeles](#), the [County of Los Angeles](#), and [City of San Luis Obispo](#) sustainability plans.

Commit to Community Choice Energy, and Specifically Consider Joining San Diego Community Power

We applaud “Measure E-5.3 Increase Grid-Supply Renewable and Zero Carbon Electricity”, and the City’s commitment to reaching 100% clean energy by 2030. We also applaud the City for conducting a feasibility study with neighboring cities to join a Community Choice Energy (CCE) program—the only viable pathway to reaching the target.

However, **the CAP must fully commit to CCE as the only pathway to reaching 100% clean energy, and should consider joining the recently launched San Diego Community Power (SDCP).** There are numerous reasons for this:

- Scale is a critical factor in the success of CCE programs. Larger programs are able to generate more revenue to provide more affordable rates, more local green energy jobs and steel in the ground projects, and more clean energy programs and incentives.
- Establishing new CCE programs takes up significant staff time and City resources. Whether establishing a stand alone CCE program or negotiating a new Joint Powers Authority agreement with other cities, starting a new CCE program takes significant staff time and financial resources. There is no need for Escondido to reinvent the wheel when there are already state-certified CCE programs now operating in the same energy service territory.
- Regional unity is needed to save us all. Cities must work together, share resources and collaborate in good faith to solve the climate crisis. Partnering with cities with a shared goal of reaching 100% clean energy also ensures Escondido can meet its CAP targets.
- SDCP best exemplifies and embodies the full potential of what CCE has to offer communities. SDCP is the only CCE program that embraces strong environmental, equity, local economic development and worker provisions, and is capable of achieving the many benefits of CCE with its scalable size. We urge City leadership and staff to have proactive conversations with SDCP to explore joining their JPA and the regional movement to 100% clean energy.

Escondido has a unique opportunity to lead North County inland cities toward an inclusive clean energy future, and we hope to be an enthusiastic partner in helping the City reach its 100% clean energy goals.

Expand all-electric measures to include single family homes

We applaud “*Measure E-4.1: Require New Residential Developments to Install Alternately-Fueled Water Heaters*”, and recommend the subsequent “*Measure E-4.2: Require New Multi-Family Residential Developments to Install Electric Cooking Appliances*” be amended to include all new residential developments. Over 42 cities in California are adopting more stringent building decarbonization ordinances to end the proliferation of methane gas infrastructure, which not only damages our climate but is a proven, dangerous indoor air pollutant. **We recommend the City adopt more robust CAP measures, and City ordinances, to require all new construction be all-electric.**

Set Higher and Citywide Mode Share Targets for Biking, Walking, and Transit

In the Draft CAP, Strategy 3 addresses the broad goal of reducing vehicle miles traveled (VMT) by increasing the share of trips taken using walking, biking, and public transit. While the steps enumerated are worthwhile actions to take, the CAP still does not commit to mode share targets for the entire city, and **we recommend Escondido commits to overall mode share targets for biking, walking, and transit.**

We also **still recommend setting higher overall targets for pedestrian, bicycle, and mass transit mode shares.** For example, the City of San Diego states its goal as, “Achieve mass transit mode share of 12% by 2020 and 25% by 2035 in Transit Priority Areas,” “Achieve walking commuter mode share of 4% by 2020 and 7% by 2035 in Transit Priority Areas,” and, “Achieve 6% bicycle commuter mode share by 2020 and 18% mode share by 2035 in Transit Priority Areas.” Escondido’s CAP should set more aggressive mode share targets tailored to the City’s local context.

Walking and Biking:

- Measure T 3.2: “Improve Pedestrian Infrastructure in Priority Areas” aims to develop a holistic Active Transportation Master Plan to increase the number of safe routes for pedestrians, students, and transit users. This goal should be updated to include other specific improvements. We recommend not only developing a complete pedestrian network with comfortable, safe sidewalks, but also commit to innovative strategies that make walking as safe and convenient as possible.
- Measure T 3.5 “Update Bicycle Master Plan” commits to installing new or improving existing Class II or better bicycle lanes. However, evidence shows that to increase ridership and promote safer streets, cities must prioritize protected bike lanes when planning for biking infrastructure. Safe, separated bikeways and bike lanes allow significantly more community members to participate in bicycling, increasing bike mode share and reducing VMT/GHG emissions. Anything less does not provide the same level of comfort or ease in travel. We recommend Class I and Class IV be included in the measure language.

Transportation Demand Management:

- Measure T 3.4 “Develop a Citywide Transportation Demand Management Plan” is an excellent measure to identify and reduce VMT, though the bike mode share targets are also low compared to other commitments in the region. We recommend the City reevaluate the City’s current bike infrastructure and potential to expand and commit to more ambitious targets.

Include Smart Land Use Policies with Affordable Housing Near Transit

Building affordable housing near transit is a necessary strategy to reduce VMT and reduce GHG emissions.¹ We are encouraged that the draft CAP calls for Escondido to encourage more mixed use, high density housing with flexible parking, and other incentives to reduce car use. However, the CAP does not currently include strategies that advance the development of affordable housing in Escondido, especially near the City’s transit centers and high-frequency bus lines.

We still recommend that the CAP include the following measures to increase the supply of affordable housing near transit:

- Pursue State grants such as the Affordable Housing and Sustainable Communities grants to support affordable housing projects near transit.
- Pursue opportunities to utilize existing properties adjacent to transit and employment centers to develop housing affordable to very low-income and low-income families.
- Develop an inclusionary housing ordinance that would require a portion of all housing to be set aside for families earning less than 80% of the Area Median Income to boost affordable housing production and support racial and economic integration.

The CAP should also add a measure specifying where smart growth and density should be targeted and what transportation mode share, VMT, and land use goals should be set for specific communities throughout the city.

The CAP must also recognize the harmful role sprawl development plays in exasperating the climate crisis, air pollution, wildfire danger, and other negative environmental, economic and social impacts. Projects like Harvest Hills will make hitting Escondido’s CAP targets much harder, undermining even a gold standard CAP.

Commit to Zero Waste

We applaud Escondido for setting a 90 percent citywide waste diversion rate by 2035. The Escondido CAP can achieve zero waste through strategies such as eliminating single-use materials, composting, and capturing landfill gas. We recommend the city develop a plastics reduction ordinance.

¹ Center for Neighborhood Technology, California Housing Partnership Corporation. (2016). Location Matters: Affordable Housing and VMT Reduction in San Diego County. Retrieved from: <https://static1.squarespace.com/static/5a6bd016f9a61e52e8379751/t/5a80f33bec212d81181be01d/1518400319715/Climate+Action+-+Affordable+Housing+And+VMT+Reduction.pdf>

Adopt an Adaptation Measure to Develop a Green Infrastructure Plan

The CAP includes some good green infrastructure strategies to sequester carbon and deliver environmental, social, and economic benefits, and **the City should adopt an adaptation measure to develop a holistic green infrastructure plan.** A Green Infrastructure Plan can include strategies that preserve or restore natural lands, implement green streets using techniques such as street trees, permeable pavements, bioretention, and swales, and retrofit policies for public and private properties that promote projects such as green roofs. We recommend quantifying targets associated with each of these strategies, including a tree canopy coverage target.

Under Strategy 9: “Carbon Sequestration and Land Conservation,” multiple measures set goals of planting new trees per year in City-owned landscaped areas and in new developments. New amendments call for specific tree planting targets. However, the CAP should commit to a quantifiable target of 35% citywide tree canopy coverage tied to investments in Priority Investment Neighborhoods first.

Center and Strengthen Equity in the CAP and Establish a Climate Commission

Climate change hits hardest in communities of concern that are disproportionately burdened by multiple sources of pollution and face health and socioeconomic challenges. California’s Environmental Health Screening Tool, CalEnviroScreen 3.0, identifies communities most vulnerable to pollution and climate impacts so that the state and local governments can direct attention and resources toward the pursuit of economic, environmental, and racial justice in those places.

We applaud Escondido for working to identify Priority Investment Neighborhoods (PINs) throughout the city for targeted, early CAP implementation. Other cities like San Diego and Chula Vista have or are in the process of developing Climate Equity Indices. As Escondido goes through this process, we recommend studying the King County 2020 Strategic Climate Action Plan, Oakland Equitable Climate Action Plan, the “Planning for a Boston Green New Deal and Just Recovery” Plan, and the Los Angeles’s Sustainability Plan “LA’s Green New Deal.” for ideas on how best to identify communities of concern for PINs designation that can truly promote greater economic, racial, and social justice.

Of course, the development and implementation of this section and the identification of PINs should take place in consultation with a diverse set of stakeholders from the most impacted of the City’s communities.

We also echo the Planning Commission’s recommendation that the City establish a Climate Commission to enhance, track and support CAP implementation. The Commission should be composed of subject matter experts, business, residents, and community stakeholders. We oppose assigning CAP oversight to the Planning Commission without significant changes to membership and operations given the body's lack of understanding and focus on climate issues.

Conclusion

Thank you for the opportunity to weigh in on the development of this critically important document. Escondido's CAP presents an opportunity to help protect the health and safety of current and future generations from the worst impacts of climate change, and set the bar for climate action policy in inland North County. We urge you to direct Staff to incorporate the recommendations above to comply with legal requirements, maximize emissions reductions, and deliver economic, safety, and health benefits to families and businesses.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Vasilakis', with a long horizontal flourish extending to the right.

Matthew Vasilakis
Co-Director of Policy
Climate Action Campaign