

ORANGE COUNTY FIRST EDITION
**CLIMATE ACTION PLAN
REPORT CARD**



EXECUTIVE SUMMARY

Climate change is a global emergency. In August 2021, the UN declared climate change “a code red for humanity.” A second IPCC report in 2022 demonstrated that, at current levels, global CO2 emissions will increase by nearly 14% over the next decade, prompting the UN Chief to declare fossil fuels a “dead end for our planet, for humanity, and yes, for Economies.”

To meet this crisis, California established goals to reduce climate pollution by 40% by 2030 and stop all climate pollution by 2045. Unfortunately, the state can only reach these goals if local governments step up, especially around land use and transportation policies.

Orange County (OC) is the second most densely populated county in the State and the third most populous county in California, yet it lacks any meaningful climate policy. Currently, out of 35 jurisdictions in Orange County, only six cities have Climate Action Plans (CAPs). Three cities are in the process of developing a CAP for the first time. Orange County lags five to ten years behind neighboring counties on climate policy, leaving residents increasingly vulnerable to worsening climate impacts and widespread environmental injustices. This lack of planning has also put OC cities at risk of losing billions of dollars in unprecedented climate funding.

When Climate Action Campaign published its first CAP report card for the San Diego region in 2017, only seven cities had CAPs. Since its release, every San Diego jurisdiction except one now has or is actively drafting a CAP. This demonstrates that Transparency around climate planning is key to winning local policies that meet the scale of the crisis.

It is well past time for Orange County and its cities to act on climate. OC cities have a golden opportunity to get it right by following successful examples from neighboring regions. This report card is a tool for elected leaders and community members to hold cities accountable and create meaningful change, reach zero emissions, and guarantee a thriving future for all.

TOP 3 TAKEAWAYS



1

OC cities are failing to plan for climate impacts by not working toward zero carbon

Orange County lags behind most other California regions in having robust and effective CAPs. The County of Orange is the most populous county in California without a CAP, and only six of OC's 34 cities currently have CAPs. Of the six cities with CAPs, none of the cities received a passing score, including GHG reduction targets to cut climate pollution as required by law under SB 32 or AB 1279, nor have they been fully implemented.

Many measures in OC CAPs are unenforceable, violating California climate law and leaving cities open to litigation. Although the State of California recommends that CAP updates occur every three to five years, Orange County's CAPs are between five and 13 years old and have never been updated.

Cities must collaborate to strengthen their decarbonization strategies rapidly. If we don't act now, our most vulnerable neighbors will be unprotected in a worsening climate emergency.

2

OC cities' failure to plan and prepare for climate impacts harms families by worsening climate pollution, deepening inequities, and leaving communities vulnerable and unprepared

Marginalized communities throughout OC are experiencing the first and worst impacts of climate change due to the legacy of redlining and environmental racism. Discriminatory redlining policies resulted in the exclusion of these communities from real estate investment. These communities became targets for toxic and industrial infrastructure rather than green spaces because of environmental racism. Worsening heat waves disproportionately harm low-income communities, communities of color, and Environmental Justice (EJ) communities which have fewer trees and parks, higher household energy cost burdens, and less access to air conditioning.

These impacts are expected to worsen as OC is projected to have the largest increase in hot days per year among all Southern California counties. According to the California EPA, up to half the residents in some OC cities live in EJ communities. With increasing temperatures and worsening environmental conditions, the burden unjustly placed on EJ communities will only increase.

Despite these impacts and the urgent need for climate policies, most policies set by OC CAPs are inadequate to protect communities against the climate crisis. None of the OC CAPs include equity considerations to prioritize the most impacted residents in local climate decision-making, and therefore, none of the cities scored points in the equity category. Only one CAP addresses green jobs and workforce development. These are missed opportunities to address injustice, improve health, provide economic development, and create family-supporting local jobs.

Because most OC cities don't have CAPs to steer policy and decision-making, cities continue to make policy choices that harm community members and the environment, such as:

- Expanding fossil fuel infrastructure,
- Greenlighting sprawl development that increases car dependence and inequities,
- Continuing the legacy of redlining with developments, investment, and zoning policies that hurt communities of concern the most,
- Excluding communities of concern in policy development and implementation.



3

We know which policies will work, and this is our moment to make it happen

At the time many OC CAPs were created, there wasn't a clear consensus about which climate measures were most effective for cities, whether the public would accept these measures, and whether funding was available. We now know the answers to these questions due to the success of many California cities, so it's time for OC cities to follow these winning examples.

This report card should guide residents, elected officials, and city staff to advocate for and implement the most effective and equitable zero-carbon CAPs as quickly as possible. We know which policies are effective, and we need cities and elected representatives to provide bold climate leadership by including them in their CAPs to benefit OC.



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ABOUT CLIMATE ACTION CAMPAIGN

Climate Action Campaign's (CAC's) mission is to stop the climate emergency by championing a zero carbon future. We organize our work into Five Fights through a lens of equity and justice: 100% Clean Energy; All-Electric Homes; Bikeable, Walkable Neighborhoods; World-Class Transit; and Resilience.

CAC will implement a replicable and scalable regional model for an equitable transition to zero carbon in the next five years. Cities are leading the way on climate solutions, and we leverage this innovation and creativity to model solutions that can be scaled and replicated around the world.

This report card highlights our Five Fights—key climate policy areas we encourage every municipality to address with quantifiable, enforceable strategies as part of a comprehensive Climate Action Plan.



THE NEED FOR LOCAL ACTION

California depends on cities and counties to meet its climate goals. The California Air Resources Board (CARB) 2022 Scoping Plan says that bold climate leadership from local governments is critical to state-level measures to limit pollution from transportation and the built environment. IPCC experts agree that cities are crucial to combatting the climate crisis.

With more than 80% of Americans living in urban areas, city leaders must advance robust decarbonization strategies and collaborate to contain the drivers of the climate emergency. The design of cities—how we use our land, where and how we build our housing, and how we get around—impacts the energy we consume and the amount of greenhouse gas emissions ("GHGs") we produce.

Therefore, Orange County cities must enforce comprehensive and legally binding CAPs that set the path to vibrant, healthy, and prosperous places to live and work. California is the planet's incubator of climate solutions, and we must provide a model of successful climate policy for the world.

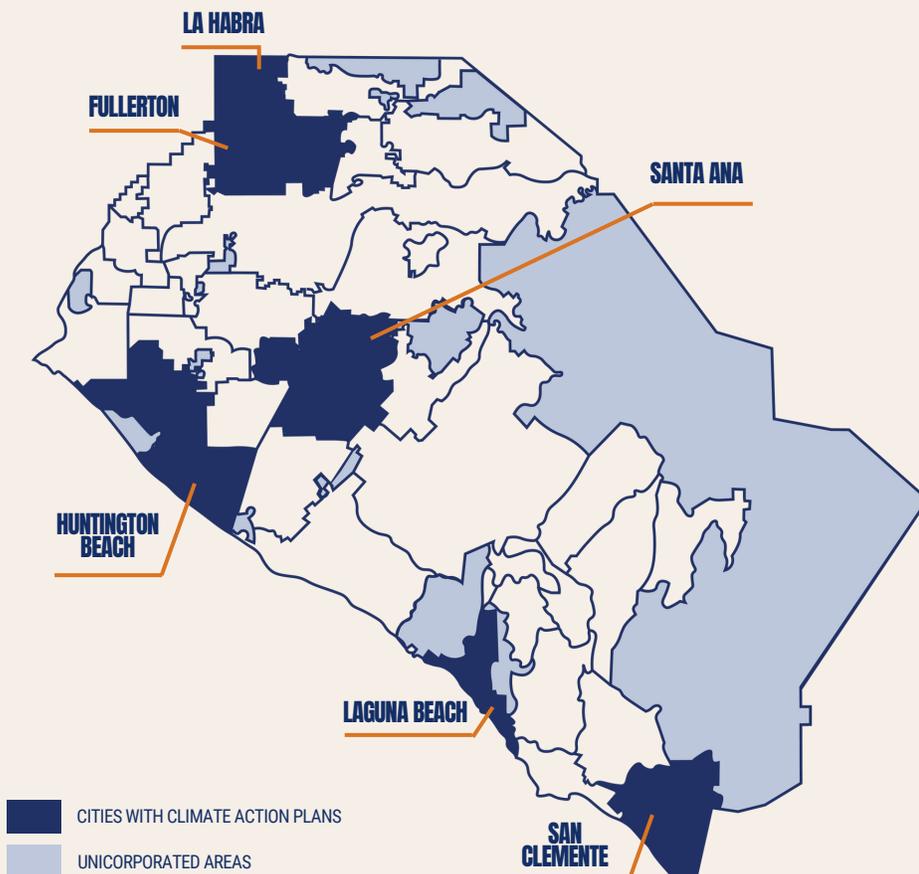
WHAT IS A CLIMATE ACTION PLAN?

Climate Action Plans (CAPs) are comprehensive tools that help local governments mitigate the climate crisis. A CAP provides a roadmap for reducing GHGs by implementing various strategies, goals, actions, and supporting measures.

These long-range planning documents quantify local governments' current GHG emissions, identify target levels to which they plan to reduce their emissions, and chart the strategies that will enable local governments to reduce emissions to their targeted levels. CAPs consider how state and federal policies will impact local efforts to reach emissions reduction targets.

Typically, CAPs focus on strategies that help reduce emissions from key categories: energy, transportation and land use, solid waste, water and wastewater, and carbon sequestration. Each city should pair its CAP with a detailed Implementation Plan that outlines how each strategy within the CAP will be implemented and funded, and how the local government will report on that implementation.

CAPs are opportunities for local governments to develop comprehensive climate strategies and implementation plans that meet the scale of the challenge posed by the climate crisis and help to bring clean air, safe streets, clean energy, affordable homes, and economic benefits to local families and businesses. CAPs can act as models of bold and equitable climate solutions that can be exported, scaled, and replicated at all levels of government.



17.65%

**OF ORANGE COUNTY CITIES
HAVE A CAP**

WHAT IS A CAP REPORT CARD?

The Climate Action Plan Report Card assesses the Orange County region's climate planning and climate action that guides the public and local governments to:

TAKE TRANSFORMATIVE CLIMATE ACTION

SHARE BEST PRACTICES

UNCOVER PATTERNS AND TRENDS ACROSS A VAST
AND SCATTERED SET OF INFORMATION

INCREASE TRANSPARENCY AND ACCOUNTABILITY

Climate Action Campaign graded local CAPs with a rubric that scores key areas including climate equity, clean energy, transportation, land use, and the green economy. This report card provides OC cities with data-driven best practices to create comprehensive plans that reflect current climate and community needs.

Through this report, we hope to spur cities to protect our region's future with CAPs that include ambitious pollution reduction targets and best practices gleaned from successful cities. We also hope to arm residents with a tool that enables them to hold their local governments accountable for reducing the pollution that causes climate change and guide the direction and speed of local policies.

The scores on page 16 evaluate climate planning and implementation efforts in OC cities.



CAP SCORES

OC'S TOP 3

The following have been chosen as OC's top CAPs because of their scores, but they are still far from the effective, equitable policies needed to address climate change.

HUNTINGTON BEACH: SCORE 40/100

Huntington Beach scored the highest overall thanks to strong structural elements in the plan, alignment with state climate goals, focus on implementation and monitoring, clear mode shift targets, and measures to reduce vehicle miles traveled.

FULLERTON: SCORE 28.25/100

Fullerton scored the second highest overall thanks to their focus on walkable, bikeable neighborhoods, and implementation of up to 70% clean energy through Community Choice Energy.

SANTA ANA: SCORE 27/100

Santa Ana scored the third highest due to their commitment to walkable, bikeable neighborhoods and the steps they have taken to implement policies and programs that increase dense infill affordable housing near transit and jobs.

HIGHLIGHTS FROM THE REPORT

Key CAP Strategies:

0	include 100% clean energy goals & Community Choice Energy (CCE)
1	has energy & water reduction goals and ordinances <i>(Fullerton)</i>
3	have zero-emission vehicle policies <i>(Santa Ana, Huntington Beach, Fullerton)</i>
1	has commuter mode shift goals <i>(Huntington Beach)</i>
3	have actionable smart growth strategies <i>(La Habra, Huntington Beach, and Santa Ana)</i>
4	have Walking, Biking and/or Complete Streets Plans <i>(Santa Ana, Fullerton, Huntington Beach, and San Clemente)</i>
0	call for Zero Waste
0	have tree canopy goals

Only six (6) of 35 Orange County municipalities have adopted a CAP. We graded all six of them in this report. Two cities are in the process of updating their CAPs. Three cities are in the process of creating a CAP for the first time. Below are statistics on the six CAPs graded in this report:

CAP Structural Elements:

5	are legally binding <i>(Fullerton, La Habra, San Clemente, Huntington Beach, and Santa Ana)</i>
1	meet state GHG targets for 2030 <i>(Huntington Beach)</i>
0	address social equity
1	address jobs <i>(Huntington Beach)</i>
3	assign implementation responsibility to staff/department & have a timeline of strategies <i>(San Clemente, Huntington Beach, and Santa Ana)</i>
1	calls for a public taskforce <i>(Laguna Beach)</i>
1	analyzes costs of strategies <i>(Santa Ana)</i>
2	require annual monitoring <i>(Laguna Beach and Huntington Beach)</i>
1	requires GHG reporting at least every 3 yrs <i>(Laguna Beach)</i>

KEY REPORT CARD RECOMMENDATIONS

We must accelerate efforts to achieve zero carbon as a region. To align with the latest science in United Nations Intergovernmental Panel on Climate Change Reports, our region must rapidly commit to and develop policies to reach Zero Carbon by 2045 or sooner to protect our communities from the harmful effects of climate change. How do we do that?

1 Act Now for The Health and Well-Being of The Community:

A CAP is a powerful tool that can help slash pollution and streamline project approvals under CEQA (the California Environmental Quality Act) if the city conforms to CEQA guidelines. However, 29 OC jurisdictions have no CAP at all, and almost all of those that do have CAPs are not in compliance with recent climate law, leaving OC families vulnerable to dangerous climate impacts due to weak plans that lack key measures and are seldom implemented. To protect the health and safety of our communities, we must act now to create meaningful CAPs.



2 Create Enforceable, Comprehensive, and Legally-Binding CAPs:

Many OC cities have chosen not to create CAPs, relying instead on a variety of other policies, general plans, non-binding sustainability plans or resolutions to partially address or create the appearance of addressing the climate crisis. Talk is cheap, and in our experience, these approaches are inadequate and rarely implemented because they are either not comprehensive, not easily accessible to the public, or not legally-binding.

A CAP is one of the most powerful tools available to local governments to protect residents from climate pollution and bring economic opportunities and public health benefits. CAPs are key because they can be legally binding, enforceable, transparent for the community, and allow for community input.

KEY REPORT CARD

RECOMMENDATIONS

3

Get Serious About Implementation Planning:

OC CAPs have sat on the shelf for as long as 13 years, collecting dust and not reducing emissions due to insufficient implementation and funding. Even plans with strong measures are missing key implementation timelines, cost estimates, and breakdowns of responsibilities. Cities should follow this process and designate a coordinator responsible for overseeing implementation, monitoring, and reporting on CAP measures in order to demonstrate accountability and commitment to climate action.



4

Prepare Now so OC Doesn't Get Left Behind for Funding:

Historically, OC has received little climate funding, but there is now an unprecedented opportunity to win state and federal funding. The Inflation Reduction Act, Infrastructure Investment and Jobs Act, and California climate budget include groundbreaking climate funding opportunities for local governments. Cities without CAPs and those unable to demonstrate effective planning will miss out on these once-in-a-lifetime funding opportunities.

OC cities demonstrate a lack of urgency in developing and updating CAPs. Many cities delay CAP creation by extending CAP completion and implementation timelines for years. Unfortunately, we do not have time to waste. We need to develop and implement CAPs as quickly as possible to be eligible to win climate funding and protect communities.

KEY REPORT CARD

RECOMMENDATIONS

5 Add Adequate Climate Staff and Budget:

Most OC cities do not have dedicated climate or sustainability staff, so climate policy is typically passed to departments that lack the time or expertise to carry out CAP strategies, often causing CAPs to be forgotten entirely. Many cities with comparable populations and effective CAPs such as Santa Monica, Sacramento, and Oakland have 8+ sustainability staffers. This lack of sustainability staff has further limited OC cities' ability to develop, implement, and monitor CAPs effectively.

Cities can ensure they have the funding needed to maintain staff and implement policies by hiring grant writers to apply for available climate funding.

Cities have also not taken advantage of free climate planning tools provided by the Southern California Association of Governments (SCAG) that can be used by existing staff without the added expense of consultants.

6 Prioritize and Follow Through on Annual Monitoring:

OC cities with CAPs have either not consistently or never shared annual monitoring reports despite the fact that many of their CAPs call for it. Without an annual monitoring report, it is difficult to tell what, if any, progress has been made. This means the community is kept in the dark about whether and where the city is delivering on its climate promises, making it nearly impossible for them to advocate for their needs. Having annual monitoring reports requires staff capacity to monitor and manage CAP implementation, underscoring the need for sustainability staff to facilitate an effective CAP.



KEY REPORT CARD RECOMMENDATIONS

7 Electrify Everything:

“Natural” methane gas is the third-largest source of GHG emissions in the region, and a powerful cause of global warming. Cities must adopt strategies to transition off methane and electrify buildings and transportation as soon as possible. No OC city has adopted an electrification policy. Without these policies, OC cities continue to increase their fossil fuel infrastructure and dependence.

All-electric new construction reach codes are an effective way to reduce pollution as cities work on the longer-term processes of developing or updating CAPs.

Public housing authorities in OC must also revise their Utility Allowance Schedules to facilitate the electrification of affordable housing, protect residents, and preserve affordable housing.

8 Uplift Communities of Concern and Create More Good Green Jobs:

Climate change hits hardest in communities of concern that are disproportionately burdened by pollution, environmental health impacts, and socioeconomic challenges. Orange County must ensure that nobody, including fossil fuel workers, is burdened or left behind in the transition to zero carbon. A just transition must include creating good, family-sustaining union jobs, creating an equitable jobs pipeline for communities of color and workers, and developing affordable, equitable, and inclusive communities powered by 100% clean, renewable energy.



SOCIAL EQUITY IN CAP IMPLEMENTATION

The worst impacts of the climate crisis, such as rising urban temperatures, polluted air, and an increase in the frequency and intensity of wildfires and floods disproportionately affect vulnerable communities worldwide. Here in the United States, the Environmental Protection Agency confirms that while climate change affects all Americans, Black, Latino, Native American, the elderly, and low-income populations will be hit hardest.

At Climate Action Campaign, we advocate for CAPs that center equity, uplift Communities of Concern, and create good, union jobs. Equitable CAP implementation addresses patterns of underinvestment and proactively plans for long-term health, economic opportunity, and quality of life.

As of 2022, no city in the Orange County region has integrated social equity into its CAP measures. Despite the presence of environmental justice communities throughout the county, as seen in figure 1., many cities either have not or only recently acknowledged the presence of these injustices in their neighborhoods. To address these injustices and achieve social equity, cities need to take into consideration the past, present, and future dimensions of equitable CAP implementation.

To incorporate equity into CAPs, cities can design specific equity targets that can be monitored over time. For example, when measuring tree city-wide tree planting, cities should include a goal to plant a determined percentage of trees in Communities of Concern. Tracking equity targets will help cities get a sense of how equitable their CAPs are.

LEGEND

CalEnviroScreen 4.0 Results

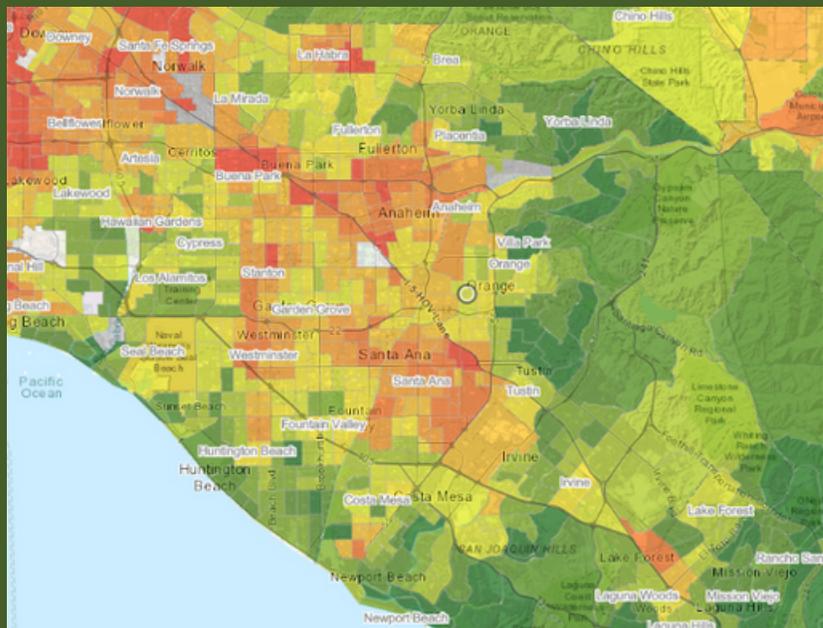


Figure 1: Map of Orange County's Cal Enviro 4.0 Results. Areas with higher scores, represented in red, indicate communities of concern that are experiencing higher levels of environmental pollution. The Cal Enviro 4.0 Map and Results are derived from CAL EPA's study and most recent screening tool.

CITY HIGHLIGHTS



CITY OF FULLERTON

WHAT'S GOING WELL

Walking and biking plans: Fullerton adopted a bicycle master plan with their CAP in 2012. One main priority in the plan is the development of an active transportation committee that oversees transportation and bike-related projects. This was created through the advocacy of the active transportation committee, which helps the city maintain and upgrade existing bike lanes.

100% Clean Energy and CCE: The city joined the Orange County Power Authority, a CCE, in 2020. In 2022, the council voted to make 70% renewable electricity the default rate for all electricity users in the city. Though a goal to reach 100% clean energy needs to be set, this is a positive step in emission reductions.

Water conservation: The CAP sets targets and ordinances for water conservation for all residential and non-residential buildings.

KEY RECOMMENDATIONS

- 1 **Update the CAP:** Fullerton's CAP was adopted in 2012, and has not been updated, making it outdated and out of compliance with recent climate laws. The city must update the CAP and publish annual monitoring reports and a GHG inventory update every three years.
- 2 **Timeline and Cost Analysis:** When the city updates the CAP, an implementation timeline, implementation cost analysis, and the department responsible for the implementation of each measure should be included. This will help the city prioritize projects and track implementation reported in the annual monitoring report.
- 3 **Smart growth strategies:** The city lacks city-wide measures to encourage dense infill development near transit. The city should set specific VMT reduction targets to encourage affordable housing near transit and jobs.
- 4 **Building Electrification:** The CAP should include comprehensive all-electric building requirements and retrofit plans.
- 5 **Trees:** There are no established tree canopy targets, despite a recent grant to improve the city's urban forest. Fullerton's tree canopy is the lowest in high-poverty census tracts in the city's southeast region. The city should establish and implement tree canopy targets that prioritize addressing these inequities.
- 6 **Transportation:** The city should track resident mode share within the city, allowing the city to set mode shift goals. The city should commit to developing a Mobility Action Plan and include mode shift targets to meet or exceed 50% bike/walk/transit by 2035.



CITY OF HUNTINGTON BEACH

WHAT'S GOING WELL

Legally-Binding State GHG Targets: Huntington Beach's Greenhouse Gas Reduction Plan (GGRP) is the only OC CAP that aims to meet state GHG targets under SB 32. It was adopted as mitigation for the city's General Plan, making it legally-binding and enforceable under CEQA.

Implementation and Monitoring Plans: The plan says the city manager will track the implementation of all GHG reduction measures and actions, with tracking for each effort and annual reporting. The plan clearly states which department is responsible for implementing each measure.

Equitable Electrification Retrofits: The plan commits to establishing strong, equitable building electrification retrofit measures, including weatherization for low-income communities and the elderly with community outreach and energy efficiency programs for rental homes.

KEY RECOMMENDATIONS

Update the CAP: The plan was adopted in 2017 and should be updated in accordance with state guidelines. Annual monitoring reports should be provided as described in the plan, and the GHG inventory should be updated now and updated again at least every three years in accordance with state guidelines.

Track Mode Shift: Huntington Beach was the only city to include mode shift goals for biking, walking, and transit, and support them with strategies and policies to achieve mode shift. However, policies such as providing low or no-cost bus passes to low-income workers must be implemented and tracked.

Building Electrification: The plan includes several all-electric retrofit plans for residential and nonresidential buildings, but should also include an all-electric ordinance for new buildings. A municipal building retrofit plan would also enable the city to reach its electrification goals.

Annual monitoring: Monitoring and annual community updates promised in the plan have never been provided. These are essential to ensure community understanding, transparency, and accountability in implementing the plan.

Equity: The plan includes a commitment to creating green jobs and policies that focus on specific environmental justice issues, but lacks an overall commitment to social equity. Equity should be prioritized throughout the plan, not only through one-off policies.

CITY OF LAGUNA BEACH

WHAT'S GOING WELL

Community outreach and engagement: Laguna Beach is the only OC CAP to emphasize the importance of community engagement, doing so by empowering an environmental committee to develop the CAP. Feedback and suggestions from the committees were taken into account in the CAP development. Though a consultant or city staff is needed to develop the CAP update moving forward, engaging committee members and creating additional strategies to engage all community members is a necessary step in having a successful CAP.

Transportation strategies: The CAP includes plans to expand public transportation, connect city bus routes to adjacent routes, and coordinate bus services with regional transportation partners to improve connections. The city has followed through on those plans, implementing free bus rides along major arterial Laguna Canyon Road, extended trolley service hours during summer months, and weekend neighborhood trolley service during the off-season.

KEY RECOMMENDATIONS

- 1 **Update the CAP:** The CAP is over 13 years old, out of alignment with recent climate law, and needs updates following proven best practices and key policies. After updating the CAP and GHG inventory, the city should publish annual monitoring reports and complete a GHG inventory update every three years.
- 2 **Become Legally Binding:** Laguna Beach should adopt a legally-binding CAP and commit to zero carbon by 2045 or earlier.
- 3 **Biking and walking plans:** The city has a dense downtown coastal area that would benefit from implementing walking and biking plans to allow greater mobility. The benefit of these projects can be increased, tracked, and monitored by setting and tracking mode shift goals.
- 4 **Building Electrification:** The CAP should include comprehensive all-electric building requirements and retrofit plans.
- 5 **Clean Energy:** The CAP should include a commitment to 100% clean electricity by 2035 or earlier and a commitment to join a Community Choice Energy program in 2023.
- 6 **Transportation:** The city should track resident mode share within the city, allowing the city to set mode shift goals. The city should commit to developing a Mobility Action Plan and include mode shift targets that will meet or exceed 50% bike/walk/transit by 2035.

CITY OF LA HABRA

WHAT'S GOING WELL

Smart Growth Strategies: The La Habra CAP includes incentives and requirements to increase dense infill development with affordable housing near jobs and transit. This has been implemented through land use and general plan policies that require projects to result in low VMTs by considering the daily needs of community members and increasing public transit access.



Reference: LA TIMES

KEY RECOMMENDATIONS

Update the CAP: La Habra's CAP was adopted eight years ago and must be updated to align with recent climate law, best practices, and key policies that are proven effective. The city should publish annual monitoring reports and complete a GHG inventory update every three years to show the city's progress and what needs to be done.

Biking and Walking Plans: Though La Habra has a bicycle plan, it lacks enforceable measures, and the city currently has no pedestrian plan. The city can update measures in the bicycle plan and add a pedestrian plan to increase mobility and incentivize mode shift away from cars within the city.

Water Efficiency: La Habra should set citywide water conservation goals to complement its adopted Water Conservation Requirements.

Building Electrification: The CAP should provide a municipal energy reduction goal, a citywide energy reduction goal, and include comprehensive all-electric building requirements and retrofit plans that prioritize reducing gas pollution exposure for vulnerable residents.

Clean Energy: The CAP should include a commitment to 100% clean electricity by 2035 or earlier and a commitment to join a Community Choice Energy program in 2023.

CITY OF SAN CLEMENTE

WHAT'S GOING WELL

Biking and Walking Plans: The CAP committed to creating Bicycle and Pedestrian Master Plans to implement transportation strategies. The city met these commitments by adopting Bicycle and Pedestrian Master Plans. Many elements of the plans have since been implemented, including the addition of 16 miles of bike lanes, improvements to 18 miles of existing bike lanes, three miles of additional sidewalks, and the ongoing addition of new sidewalks and bike lanes as prescribed in the bicycle master plan. These measures improve connectivity throughout the city.

Implementation Roles: The CAP identifies the department responsible for implementing each measure in its implementation matrix.

KEY RECOMMENDATIONS

- 1 **Update the CAP:** San Clemente's CAP was adopted eight years ago and needs to be updated. Updating the CAP will bring it in alignment with recent climate laws, best practices, and key policies that are proven effective. The city should also adopt detailed implementation and funding plans. After updating the CAP, the city should publish annual monitoring reports and GHG inventory updates every three years.
- 2 **Building Electrification:** The city should commit to all public and private buildings being all-electric by 2040 or earlier, including municipal facilities.
- 3 **Energy and Water Efficiency:** The city needs to include incentives or requirements to increase water and energy efficiency, a necessary step in reducing GHGs in the city.
- 4 **Transportation:** The city should track resident mode share within the city, which will allow the city to set mode shift goals. The city should commit to developing a Mobility Action Plan and include mode shift targets that will meet or exceed 50% bike/walk/transit by 2035.
- 5 **Clean Energy:** San Clemente discussed joining a Community Choice Energy program in 2018, and voted against joining the Clean Energy Alliance in July 2022. The CAP should include a commitment to 100% clean electricity by 2035 or earlier and a commitment to join a Community Choice Energy program in 2023.



CITY OF SANTA ANA

WHAT'S GOING WELL

Timeline and Cost Analysis: The CAP includes an implementation timeline for every CAP measure as well as an analysis of the cost of each measure to the city and residents.

Biking and Walking Plans: The city created a Pedestrian Master Plan, a Safe Mobility Plan, and a Safe Routes to Schools Plan. These plans have already resulted in increased connectivity, protected bike lanes, complete street projects, a Transportation Advisory Committee, and collaboration with mobility justice-focused community organizations. The city updated its zoning code to encourage better connectivity between residential and commercial areas.

Smart Growth Strategies: The CAP does not outline clear smart growth strategies or VMT reduction goals, yet the city has implemented many of its proposed voluntary measures. The city created an inventory of affordable housing opportunity sites for dense infill development and used that inventory to incentivize projects by providing loans for related development. The city passed the 2021 Affordable Housing Opportunity and Creation Ordinance to prioritize infill development near transit.

KEY RECOMMENDATIONS

Update the CAP: The CAP was adopted in 2015, but is outdated and doesn't follow current climate law. The CAP update should align with climate law, include an updated GHG inventory, and implementation and funding plans. The city should publish annual monitoring reports and complete a GHG inventory update every three years.

Implementation Roles: The city should hire a CAP manager within the planning department to oversee the implementation of the CAP and ensure implementation is recorded and progress is published annually.

Equity and Jobs: Santa Ana should prioritize equity through extensive community outreach and input throughout development and implementation via a CAP advisory committee. The city must prioritize creating high-paying local green jobs through CAP implementation.

Building Electrification: The CAP should include comprehensive all-electric building requirements and retrofit plans that prioritize reducing gas pollution exposure for vulnerable residents.

Clean Energy: The CAP should include a commitment to 100% clean electricity by 2035 or earlier and a commitment to join a Community Choice Energy program in 2023.

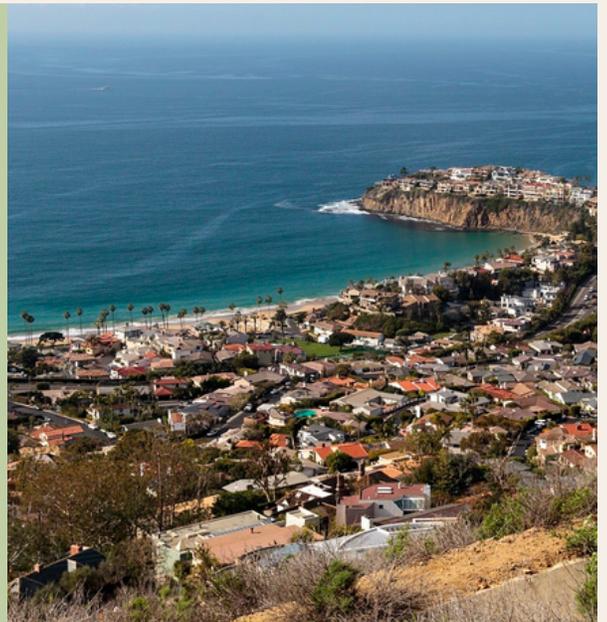
Utility Allowance: The Housing Authority must adopt a Utility Allowance Schedule that decarbonizes affordable housing, protecting residents from extreme heat events.

CAP ADOPTED

UPDATES IN PROGRESS

LAGUNA BEACH

Laguna Beach approved \$450,000 in its March 2022 midyear budget for the creation and implementation of a CEQA-certified CAP.



SANTA ANA

Santa Ana's General Plan update included a goal of updating their CAP in 2023. Staff has said that the update process will begin in January.

NO ADOPTED CAP

DEVELOPMENT IN PROGRESS

ANAHEIM

The City of Anaheim is using a grant from SoCal Gas to develop its first CAP. SoCal Gas is the largest for-profit, gas-only utility in the U.S., with a long history of opposing climate policy. SoCal Gas' involvement could prevent Anaheim from adopting key decarbonization policies opposed by the company, such as gas-free, all-electric building requirements.

The city said it would complete the CAP within two years of beginning the project, which started in early 2022. Anaheim is currently preparing a draft EIR for the CAP and General Plan Update. No further information about the CAP development or timeline is currently available. The city conducted community outreach with specific attention to environmental justice communities in 2022 and has since completed its draft Environmental Justice element, which will be included in the General Plan Update.

Anaheim Public Utilities created a GHG reduction plan in 2020, which lists the successful implementation of several climate-related programs, but is not included in this report because the GHG reduction plan lacks key components such as an EIR or CEQA analysis and a technical appendix explaining emissions reduction calculations for each measure. The absence of these components means the plan is not legally binding, significantly reducing its ability to effectively and equitably reduce climate pollution.

The city should publish a transparent CAP timeline, focus CAP outreach in environmental justice communities, expand electrification policies throughout the city, and more.

Anaheim has adopted significant transportation measures including committing to an all-electric bus fleet by 2025. Anaheim is running electric buses in the city and offers incentives to businesses and schools to electrify their fleets.

Anaheim Housing Authority offers the only Energy Efficient Utility Allowance Schedule in Orange County. The city should also adopt a heat pump Utility Allowance (UA) that will facilitate building decarbonization of affordable housing and an air conditioning UA to protect vulnerable families from extreme heat events.

Key Fact: Anaheim is the only city in Orange County that still depends mostly on coal for electricity generation. More than 55% of Anaheim Public Utilities' electricity is generated by burning coal, thanks to a 40-year contract with the Intermountain Power Plant in Utah. The contract expires in 2027.

NO ADOPTED CAP

DEVELOPMENT IN PROGRESS

COSTA MESA

Costa Mesa approved a CAP budget in 2022, but says the CAP is on hold until sustainability staff is hired. No sustainability or climate-related staff positions are currently listed on the city's website. In 2020, the city created a sustainability plan, which contains no GHG inventory, no targets for emissions reductions and is not legally binding.

IRVINE

The City of Irvine began discussing a Climate Action and Adaptation Plan (CAAP) in 2016. Seven years later, Irvine has yet to publish a draft and follow through on climate action and planning.

In June 2021, Irvine approved a CAAP budget and a \$450,000 consultant agreement, which included a timeline of CAAP activities to be completed by December 2022, most of which the city failed to deliver.

In mid-2022, instead of delivering on climate promises, Irvine staff gave CAAP presentations featuring gas industry talking points and delay tactics at both a city council meeting and an environmental committee meeting.

Irvine's sustainability staff members had little involvement in the CAAP and related policies in 2022, focusing instead on the Cool Block program, which reduces residents' individual carbon footprints. Community engagement on the CAAP has been stifled by public comment policies and CAAP events exclusive to business interests and a small handful of environmental organizations.

In January 2023, Irvine voted a second time to draft an all-electric new building policy. The previous council unanimously approved the same action in December 2021, but delayed follow-through for more than a year at the request of monied interests such as the gas industry.

In the absence of a CAAP, Irvine routinely approves development based on outdated EIRs.

Irvine has taken some steps toward reducing GHGs by committing to 100% renewable energy as its default through OCPA and including an EJ element in its planned general plan update. Recently, the City of Irvine began to reorganize its sustainability department and is recruiting additional staff.

Climate Action Campaign will continue to advocate for accelerated CAAP adoption, transparency in the CAAP process, meaningful community engagement, adoption of an implementation and funding plan with the CAAP, and policies that prevent the expansion of fossil fuel infrastructure in Irvine.

WHY WE FOCUS ON CAPS

Climate Action Campaign encourages cities to develop standalone Climate Action Plans (CAPs) because they are the most comprehensive, transparent way for local governments to mitigate climate change—detailing steps municipalities can take to reduce their greenhouse gas (GHG) emissions and prepare for impacts from a changing climate. CAPs can also quantify and outline strategies to address the emissions “gap”—emissions reductions needed to meet local and state emissions targets after accounting for state and federal policies.

Some cities below have climate-related policies in various city documents such as general plans, circulation elements, safety elements, and others, but very few people will ever read any of those documents, much less cross-reference them.

Consolidating climate plans into a single document makes the information more accessible to the public, city staff, and electeds, making plans more likely to be implemented and aiding accountability.

The best CAPs are CEQA-qualified to streamline new, climate-friendly development. In order to comply with CEQA, governments must provide specific details and substantial evidence on how proposed actions will be implemented and result in promised GHG reductions. This must include information on the scope, scale, costs, and timelines per action as required by CEQA for the privilege of project development streamlining. A CAP puts all these pieces together and creates a roadmap for implementation. For these reasons, our report card focuses on CAPs.

NO COMMITMENT

26 OC municipalities have no commitment to creating a CAP.

Aliso Viejo	Mission Viejo
Brea	Newport Beach
Buena Park	Orange County*
Cypress	Orange
Dana Point	Placentia
Fountain Valley	Rancho Santa Margarita
Garden Grove	San Juan Capistrano
La Palma	Seal Beach
Laguna Hills	Stanton
Laguna Niguel	Tustin
Laguna Woods	Villa Park
Lake Forest	Westminster
Los Alamitos	Yorba Linda

*The County of Orange is the largest county in California without a CAP. The county's lack of a CAP or any sustainability staff is a major obstacle to regional collaboration, putting every OC city at risk.

The OC Housing Authority's Utility Allowance Schedule is an obstacle to the decarbonization of affordable housing in 32 OC cities. The County should adopt a UAS that supports building electrification and protects residents from extreme heat events.

CLIMATE ACTION PLAN GRADING CRITERIA

Out of 100 points, nearly half of the points (47 pts) are assigned to CAP structural elements, and 53 points are assigned to key emissions reductions strategies we recommend for inclusion in every CAP based upon feasibility and effectiveness.

POINTS

CAP STRUCTURAL ELEMENTS (50 PTS)



ADOPTED CAP
3 PTS

What: CAP has been adopted by the municipality (draft CAPs and actions not tied to a CAP are not graded).

Why: The first step toward taking bold action to fight climate change is adopting a comprehensive plan to reduce emissions.



LEGALLY BINDING
10 PTS

What: CAP and its GHG targets, as a whole, are legally binding. CAP should also undergo CEQA environmental analysis. It should have a Technical Appendix with substantial evidence explaining GHG emission calculations for each measure. *Note: Grades are based on our best determination using available information, and are not an official legal opinion.

Why: Legally binding CAPs must be implemented, meet their GHG targets, and cannot be ignored. CEQA environmental analysis allows for stakeholder involvement and transparency in assessing a CAP's environmental impact. A detailed technical appendix shows how the GHG targets in the CAP were calculated. Substantial evidence supporting GHG calculations is also required under CEQA when a CAP is mitigation for a city's General Plan.



STATE GHG TARGETS 10 PTS

What: A CAP's GHG goals should extend to at least 2030 and meet state GHG targets. CA's goals are: 1990 GHG levels by 2020 (AB 32); 40% below 1990 levels by 2030 (EO B-30-15 and SB 32); 80% below 1990 levels by 2050 (EOS-3-05); Carbon neutrality by 2045 (EO-B-55-18); 85% below 1990 levels by 2045 (AB 1279)

Why: State GHG targets set consistent, collective goals based on what the best available climate science indicates is necessary to avoid the worst impacts of climate change. These targets are widely acknowledged to be the significance threshold for CAPs used for CEQA tiering.



IMPLEMENTATION AND MONITORING 11 PTS

Roles

What: Designated implementation coordinator, department responsible for the CAP is identified, and calls for a public advisory body.

Why: Ensures one or more parties are responsible for CAP implementation and lists who they are so they can be held accountable to the community. The public advisory body is another mechanism to ensure accountability and community involvement.

Timeline and Cost Analysis

What: Detailed timeline with a system to prioritize implementation of each strategy, as well as cost analysis for each strategy

Why: Allows the public to track if a city is on a path to meet its targets and helps local governments set sufficient budgeting and staffing levels at the appropriate times.

Annual Monitoring

What: Commit to publishing CAP implementation progress report annually and a GHG inventory at least every 3 years.

Why: Allows local governments and the public to gauge progress made toward implementing CAP strategies, determine if a local government is on track to meet GHG targets, and assess if adjustments are needed.



EQUITY & JOBS
10 PTS

What: Prioritize low-income communities of color to be the first to benefit from CAP strategies, such as sustainable transportation infrastructure and infill development. CAPs should also include a green jobs section that provides data quantifying both job quality and demographic and geographic distribution of workers. That section should commit to leveraging existing skilled training and apprenticeship infrastructure to create and sustain middle-class career ladders.

Why: Low-income communities of color are hit first and worst by climate change through higher air pollution and other negative health impacts, and have less resources to protect against a hotter and drier Orange County. These communities also face some of the highest underemployment and unemployment rates. The green economy should provide good-paying, middle class jobs that lift-up working families.

POINTS

EMISSIONS REDUCTION STRATEGIES (50 PTS)



CLEAN ENERGY
27 PTS

100% Clean Energy

What: Commit to reaching 100% clean energy by specified date.

Why: 100% clean energy is the national-leading standard. Its inclusion in CAPs is likely necessary to meet California's GHG targets. Energy is typically a city's 2nd largest source of GHG emissions, and energy policy is well within the purview of local government.



CLEAN ENERGY
27 PTS

Community Choice Energy (CCE)

What: Include CCE as a key clean energy strategy.

Why: CCE is one of the most effective ways to reduce GHG emissions, achieve 100% clean energy, and foster local control of energy decisions. CCE allows municipalities to provide clean energy for families and businesses at a competitive cost compared to a monopoly utility. It also allows families to have choice in their electricity provider, and brings in significant revenue to the participating municipality.

Building Electrification

What: CAP should include the following: All electric goals for the city, a commitment to pass an ordinance for all electric new construction, a commitment to establishing strong, equitable retrofit measures, and a commitment to creating an all electric municipal building plan.

Why: Building Electrification is a key measure to reduce GHG emissions, remove toxic fossil fuels from homes, and reduce fossil fuel dependence. Electrification allows homes and buildings to run off of clean energy and creates local green jobs that can't be outsourced.

Energy & Water Efficiency

What: CAP should include the following: Citywide energy reduction goal, municipal energy reduction goal, citywide energy efficiency ordinance, citywide water conservation goal, citywide water conservation ordinance, related incentives and/or financing assistance.

Why: The cheapest energy and water is that which is never used. It is also the number one job creator in the clean energy economy. Water conservation is also a climate adaptation strategy as fresh water becomes increasingly scarce in Southern California's changing climate.

ZEVs – Zero Emission Vehicles

What: Strategies to promote ZEVs and convert municipal vehicle fleet to Zero Emission Vehicles (ZEV).

Why: ZEVs powered by clean energy accomplish clean energy goals and reduce vehicle-related GHG emissions. Municipalities can show leadership by powering their vehicle fleets on 100% clean energy.



TRANSPORTATION &
LAND USE
19 PTS

Commuter Mode Shift Goals

What: Quantifiable goals to shift commutes to transit, walking, and biking.

Why: Shifting away from reliance on cars as the primary mode of transportation reduces GHG emissions and has the co-benefits of improved public health, safety, and air quality. Mode shift goals also help municipalities plan and budget to facilitate a shift away from car-centric growth, as well as advocate for assistance for better transit infrastructure.

Smart Growth

What: Actionable strategies to support transit oriented development (TOD), smart growth, and affordable housing.

Why: Smart land use policies are essential to support commuters' ability to choose non-car transportation. Dense development should be located near transit, walking, and biking infrastructure. Affordable urban housing enables people to use non-car transportation, rather than depending on a car for daily commutes.

Biking & Walking Plans

What: Commitment to developing comprehensive biking and walking plans and/or complete streets plan, as opposed to disparate strategies.

Why: Comprehensive plans are the most cohesive way to create robust policies supporting biking and walking, achieve GHG reduction targets, and meet a community's transportation needs.

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Other Transportation Strategies



TRANSPORTATION &
LAND USE
19 PTS

What: Commitment at least 5 of these: minimum street design criteria to foster non-car transportation; multimodal improvements; prioritizing HOV's over SOV's; traffic calming; safe routes to schools; transit-first resolution; advocating for non-car transportation at regional transit agencies; Vision Zero; other Transportation Demand Management measures.

Why: Committing to specific transportation best practices increases transparency and accountability for achieving GHG reduction targets.



ZERO WASTE
5 PTS

What: Commit to Zero Waste by specified date.

Why: Waste decaying in landfills emits methane, a potent GHG. Waste typically generates 3% to 11% of municipal GHG emissions.



TREES
5 PTS

What: Quantifiable goal for increasing tree canopy by planting drought-resistant, climate-friendly trees.

Why: Trees provide shade, while filtering the air and absorbing carbon.

CAP IMPLEMENTATION GRADING CRITERIA

A Note About Scoring: Implementation is scored cumulatively, so actions from the time of CAP adoption through the present year are considered. Expectations of progress grow as the number of years a CAP has been adopted increases. If a CAP has detailed timelines or implementation phases, and a given action is slated to be implemented starting after the current year, no points will be deducted if the city has not yet begun implementing it. If, however, the CAP does not include detailed timelines or phases and an action is entirely omitted from the city's reporting, then points will be deducted.

POINTS

KEY CAP STRATEGIES (50 PTS)

ANNUAL
MONITORING REPORT
PUBLISHED
10 PTS

What: City has made a monitoring report available to the public tracking progress toward CAP targets.

Why: Allows local governments and the public to gauge progress made toward implementing CAP strategies, determine if a local government is on track to meet GHG targets, and assess if adjustments are needed.

SUMMARY OF
PROGRESS
10 PTS

Report Includes Progress Toward GHG Target

What: Includes a quantitative measure of progress toward GHG targets based on the most recent available data.

Why: GHG reductions are the ultimate measure of whether cities are on track to meet their targets.

Report Includes Progress Toward Implementing Actions

SUMMARY OF
PROGRESS
10 PTS

What: Summarizes the progress toward implementing CAP measures, for example with statements such as “55% of Phase 2 Actions are in progress, 20% are completed, and 25% have not been initiated,” or, “85% of actions are on track to be implemented in line with the CAP timeline,” or through a summary graphic that conveys similar information.

Why: A brief summary of progress on CAP actions supports public accountability, increases transparency, and allows a side-by-side look at the correlation between GHG reductions and the status of CAP actions.

PROGRESS REPORTED
BY MEASURE
15 PTS

What: Progress on each action or measure in the CAP is described with clarity and specificity. Progress is quantified whenever possible, and the units of measure in status descriptions match the units in performance metrics.

Why: Detailed reporting ensures local governments and the public can gauge progress accurately and enables informed decision-making regarding implementation in subsequent years.

CAP STRATEGIES
60 PTS

The point values for progress on CAP strategies are similar to the point values for inclusion of those strategies in the CAP: Equity & Jobs (10), Energy (25), Transportation & Land Use (22), Zero Waste (5), and Trees (5).

LIST OF ABBREVIATIONS

ADU - Accessory Dwelling Unit

AFV - Alternative fuel vehicle

AB - Assembly Bill

BAU - Business-as-usual

**CAAP - Climate Action and
Adaptation Plan**

CAC - Climate Action Campaign

CAP - Climate Action Plan

**CARB - California Air Resources
Board**

CCE - Community Choice Energy

**CEQA - California Environmental
Quality Act**

CO₂ - Carbon dioxide

EIR - Environmental Impact Report

EJ - environmental justice

EO - Executive Order

EV - Electric vehicle

**GGRP - Greenhouse Gas Reduction
Plan**

GHG - Greenhouse gas

GP - General Plan

GPU - General Plan Update

**IPCC - Intergovernmental Panel on
Climate Change**

LED - Light-emitting diode

MW - Megawatt

MWh - Megawatt-hour

**MTCO_{2e} - Metric tons of carbon
dioxide equivalent**

OC - Orange County

**OCPA - Orange County Power
Authority**

**OCTA - Orange County Transit
Authority**

**SCAG - Southern California
Association of Governments**

SB - Senate Bill

SCE - Southern California Edison

SDG&E - San Diego Gas & Electric

State - State of California

**TDM - Transportation demand
management**

UA - utility allowance

UAS - utility allowance schedule

UN - United Nations

VMT - Vehicle miles traveled

ZEV - Zero-emissions vehicle

TERM

DEFINITIONS

Annual Monitoring Report – summarizes CAP measure implementation progress toward GHG reductions targets and actions specified in the CAP.

California Environmental Quality Act (CEQA) – California’s broadest environmental law. CEQA helps guide the Department during the issuance of permits and approval of projects. Courts have interpreted CEQA to afford the fullest protection of the environment within the reasonable scope of the statutes. CEQA applies to all discretionary projects proposed to be conducted or approved by a California public agency, including private projects requiring discretionary government approval.

Climate Action Plan – a plan prepared by an entity to reduce greenhouse gas emissions and identify climate change adaptation strategies to be implemented.

Complete Streets Policy – transportation policy and design approach that requires streets to be planned, designed, operated, and maintained to enable safe, convenient, and comfortable travel and access for users of all ages and abilities regardless of their mode of transportation.

Community Choice Energy - also known as Community Choice Aggregation, is a local, not-for-profit government program that empowers communities to purchase electrical power on behalf of its residents. This puts more control in the hands of people, businesses, and local governments, allowing them to choose clean energy, administer energy efficiency programs, and more.

Environmental Justice - the fair treatment and meaningful involvement of all people, regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no population bears a disproportionate share of negative environmental consequences resulting from industrial, municipal, and commercial operations or from the execution of federal, state, and local laws; regulations; and policies. Meaningful involvement requires effective access to decision makers for all, and the ability in all communities to make informed decisions and take positive actions to produce environmental justice for themselves.

General Plan - provide a vision for future growth and development. A General Plan identifies the community's land use, transportation, environmental, economic, and social goals, and policies related to land use and development.

Global Climate Change - Human-caused emissions of greenhouse gasses above natural ambient concentrations are responsible for intensifying the greenhouse effect and leading to a trend of unnatural warming of the Earth's climate, known as global climate change.

Greenhouse Gas - a type of gas that causes heat to be trapped in the atmosphere, resulting in warming effects for the Earth.

Greenhouse Gas Inventory - provides a snapshot of emissions generated by the community and municipal activities in a given year and provides a baseline from which emissions trends are projected.

Implementation Strategy - determines the priority of strategies based on various factors, including cost, staff resources needed, ease of implementation, and timeframe.

Mode Share (also called mode split, modal share, or modal split) - the percentage of travelers using a particular type of transportation or the number of trips using said type. Modal share is an important component in developing sustainable transport within a city or region.

Greenhouse Gas Inventory - a type of emission inventory that is developed for a variety of reasons. Policymakers use inventories to develop strategies and policies for emissions reductions and track progress on those policies.

Reach Code - a local building energy code that "reaches" beyond the state minimum requirements for energy use in building design and construction, creating opportunities for local governments to lead the way on clean air, climate solutions, and the renewable energy economy, while creating roadmaps for other local governments to take action as well.

Reduction Targets - Climate Action Plans set target levels for local greenhouse gas reductions by certain dates. Current state laws include Assembly Bill (AB) 32, which established a target of reducing statewide GHG levels to 1990 levels by 2020; Senate Bill (SB) 32, which established a mid-term target of reducing statewide GHG levels to 40 percent below 1990 levels by 2030; Executive Order (EO) S-3-05, which recommends a 2050 statewide goal of reducing GHG emissions 80 percent below 1990 levels, Executive Order (EO) B-55-18, which recommends statewide carbon neutrality by 2045, and (AB 1279), which established a target of reducing GHG levels 85% below 1990 levels by 2045.

Reduction Strategies and Measures - Greenhouse gas reduction strategies and measures aim to close the gap between the City's anticipated legislatively-adjusted business-as-usual emissions and the reduction targets.

Utility Allowance - In subsidized affordable housing, a Utility Allowance is an amount deducted from the household's rent portion when the tenant is responsible for utilities. The Utility Allowance is a reasonable estimate of tenant utility bills and is intended to alleviate residents' utility costs. The total or gross rent for the unit restricted under affordable housing programs includes the rent residents actually pay to the landlord (net rent) and the required Utility Allowance amount. Due to this relationship, when Utility Allowances are high, rent is lower and vice versa. Utility Allowances that are higher than residents' actual utility bills discourage housing providers from installing electrification technologies because they cannot recover their upgrade costs from the utility savings to the residents.

Utility Allowance Schedule - Public Housing Authorities are required to maintain a utility allowance schedule for tenant-paid utilities. The utility allowance schedule must include the utilities and services necessary to provide housing that complies with Housing Quality Standards (HQS). These schedules must be updated by the public housing authority on an annual basis. The utility allowance schedule is meant to approximate the resident's utility consumption by energy-conservative households that occupy housing of a similar size and type in the same locality. The allowance is used in determining the family's share of rent and the housing authority subsidy.

